

**Code of
Ethics &
Standards of
Conduct**

“ INTEGRITY

**or doing what’s right, must
continue to govern our actions
in all relationships with customers,
colleagues and others with whom
we do business.”**

James Woodward, President



A message from Jim Woodward



To all staff of Meriter and affiliates:

Meriter has a strong history of charitable service based on our Mission and Values. The reputation for quality and integrity that we enjoy is founded on a tradition of ethical behavior that predates the formation of Meriter Health Services. Our community leadership and success as an organization are based largely on the teamwork and commitment of our employees. Integrity, or “doing what’s right,” must continue to govern our actions in all relationships with customers, colleagues and others with whom we do business. In the past, we have relied heavily on the standards developed by health care industry professional groups to define expectations of ethical behavior. As business issues have become more complex, it’s time for us to state as clearly as possible, Meriter’s standards for ethical conduct. To this end, we have developed Standards of Ethical Conduct for all Meriter employees. I am asking each of you to make a personal commitment to these standards:

- Obey laws and regulations governing our business conduct.
- Be honest, fair and trustworthy in all activities and relationships.
- Avoid all conflicts of interest between work and personal affairs.
- Foster an atmosphere in which equal opportunity extends to every member of our diverse community.
- Strive to create a safe workplace and to protect the environment.
- Help build a culture where ethical conduct is recognized, valued and exemplified by all employees.

We need feedback from you in order to be continually responsive to internal issues, situations or events that may detract from our reputation as a responsible community health care organization. If you have a concern about what is proper conduct for you or anyone else, please raise that concern immediately with your manager or other organization leader. You can also contact the corporate compliance department. Nothing is more important than doing what’s right. Any concerns you may have about inappropriate conduct will be promptly addressed with care and respect.

In addition to the normal communication channels, we have instituted “AlertLine” for all Meriter employees. AlertLine is a toll-free, 24-hour service available every day to all employees. All calls are handled in a confidential manner. It’s important for you to understand that AlertLine is not a substitute for our philosophy of open communications and our regular responsibilities of observing and reporting any issues or concerns. Rather, it provides an anonymous alternative to report conditions and situations where you may not be comfortable using normal channels of communication. AlertLine is designed to prevent or resolve situations that may violate our standards of ethical conduct, or could result in risk or harm to you, your co-workers, our customers or our organization. We are proud of our employees, our organization and our reputation for quality and integrity. Each of us is responsible for maintaining and protecting our reputation and how we are viewed by our communities. Let’s continue our tradition of excellence and assure our role as a provider and employer of choice in our community.

Sincerely,

Jim Woodward
President

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You have several options for discussing issues related to Meriter's standards of ethical conduct:

- Talk to your supervisor, manager, director or vice president
- Call Meriter's Corporate Compliance department at (608) 417-5831 or (608)-417-5843
- Call Meriter's Human Resource Department at (608) 417-6134
- Call Alertline, a toll-free number that provides anonymous reporting at 1-800-387-3069.

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There are several opportunities available to you for training or to find additional information on specific topics.

SECTION 1 • APPLYING THE STANDARDS

Meriter Health Services is dedicated to maintaining an environment where high personal and work standards contribute to the delivery of excellent health care. It is the duty of each individual associated with Meriter to commit to the highest ethical standards in their actions and decisions regarding the care of patients, management of the organization, and the conduct of business. The **Meriter Code of Ethics** is intended to guide the quality and integrity of our many relationships and the provision of our services. Employees are expected to conduct themselves in accordance with the following standards:

- Obey the laws and regulations governing our business conduct.
- Be honest, fair and trustworthy in all activities and relationships.
- Avoid all conflicts of interest between work and personal affairs.
- Foster an atmosphere in which equal opportunity extends to every member of our diverse community.
- Strive to create a safe workplace and to protect the environment.
- Help build a culture where ethical conduct is recognized, valued and exemplified by all employees.

All areas of the Meriter system will reflect these ethical standards:

- when addressing patient and resident rights issues;
- when making informed decisions with patients, residents and families about care including admission, treatment, transfer, discharge and billing practices;
- in the governance, management and administration of all levels of the organization;
- in all relationships with employees and staff;
- in business encounters with vendors, payers, competitors and governmental bodies; and
- in communicating and dealing with the public and our community partners.

Core Values

The operations of Meriter will be accomplished in accordance with our core values and a deep commitment to our customers. Our commitment embodies values integral to carrying out our mission: “to heal this day, to teach for tomorrow, to embrace excellence always, to serve our communities—for a lifetime of quality health care.” Meriter’s Values Statement:

- We serve our patients, each other and the community.
- Meriter is its people.
- Clinical and service excellence is our way of life.

Commitment to Customers

We believe that our customers’ needs, expectations, and rights are our highest priority. Meriter Hospital’s Patient Bill of Rights expresses the Hospital’s commitment to its patients; Meriter Terraces, Meriter Health Center and Meriter Home Health have also each prepared a Bill of Rights for their patients and residents. Specific corporate and entity policies address expectations regarding standards of conduct and care of patients, residents and clients.

Commitment to Physicians

We believe in providing a quality workplace for physicians who practice at Meriter -- physically, technologically and clinically -- in order to enhance the provision of health care. Meriter provides for and encourages physician input into policy and operational issues.

Commitment to Employees

We respect the diversity of employees’ gifts and talents, and we believe in each employee’s unique ability to contribute toward quality patient and resident care. It is our belief that integrity, honesty, trust and respect are fundamental values and mutual expectations of the organization and its people.

An Ethical Place to Receive Care

Provision of Care

Decisions regarding medical diagnoses, treatment and care shall be based on the health needs of the patient and such decisions shall not be affected nor influenced by the patient's personal financial situation or mechanism for reimbursement, nor by any financial incentive or disincentive to the provider of care.

Patient Safety and Quality of Care

Meriter is committed to providing a culture in which safety is viewed as a core principle which guides all of our decisions and process designs. All employees and medical staff members are expected to consistently strive to provide high quality and safe care. Likewise they have an ethical obligation to identify any situations where patient, resident, or employee safety may be in question, so that corrective actions may be taken immediately.

Privacy and Security of Protected Health Information

All Meriter entities place a high value on patient, resident, client and customer privacy and the expectation that information about care received remains confidential and is made available only to individuals who have a legitimate right to know. All employees have an ethical and legal obligation to keep certain information confidential and to protect and safeguard such information against tampering and unauthorized use or disclosure.

Transfer and Admitting

Admission, transfer and discharge of Meriter patients and residents shall be performed in an ethical manner and according to applicable local, state and federal laws. No patient or resident referred for admission shall be denied services on the basis of sex, race religion, color,

national origin or ancestry, age, disability, marital status, source of income, arrest or conviction record, less than honorable discharge, veteran status, military participation, physical appearance, sexual orientation, political beliefs or student status. There shall be no diagnostic restriction on the admission of hospital patients, except for services not provided at Meriter.

Patient and residents will not be transferred arbitrarily. We believe an individual should be transferred to another treatment or residential facility or provider only if such transfer would provide needed or desired medical care unavailable at Meriter or to improve patient and resident well being.

Billing

We believe in fair and understandable billing, seeking payment only for services actually rendered, assessing charges at reasonable rates, having auditing procedures to ensure accurate billing, and responding to billing questions courteously, quickly, helpfully and justly. General billing inquiries and complaints shall be handled promptly by the Business Office in a nonbiased manner. Billing complaints related to patient care shall be referred to the Hospital Patient Representative for investigation and resolution; other Meriter entities shall also designate specific individuals to respond to billing complaints. General credit and collections procedures are handled within the scope of a community partnership, according to ethical standards and in compliance with all applicable state and federal laws.

Detecting and Preventing False Claims

We do not tolerate making or submitting false or misleading claims or statements to any governmental agency, health care program or payer source. Information is shared with employees about federal and state false claims regulations which impose monetary penalties on any person or entity who knowingly files a false or fraudulent claim. Information is also shared with employees about state and federal whistleblower protection laws. These laws protect employees and contractors who disclose information that a health care facility has violated any state or federal law, or pose a risk to public health or safety. More detailed information on Meriter's procedures for detecting and preventing billing fraud waste and abuse may be found in the corporate policy, "Billing Fraud and Abuse-Detecting and Preventing False Claims".

Ability to Pay

We believe that it is our responsibility to provide care to all those who are in need, within the reasonable bounds of responsible stewardship. No individual will be denied emergency medical care regardless of their ability to pay. Meriter Hospital and its clinics will provide uncompensated care for those unable to pay for needed health care services in accordance with the criteria and process outlined in the Hospital's Uncompensated Care Program and Meriter Retirement Services in its "Benevolent Care Policy". General Medical Laboratories and Meriter Home Health shall also provide a means for assessing and responding to individuals who have difficulty meeting their financial obligations.

Marketing and Advertising

Meriter's marketing and advertising practices shall be conducted with truth, fairness and responsibility to patients and the community at large. Marketing materials will promote only

services available, will reflect only the level of licensure and accreditation at time of publication, and will comply with applicable laws and regulations of truth in advertising and nondiscrimination.

Diversity

In response to the demographic changes occurring in South Central Wisconsin, Meriter seeks to provide extraordinary customer service to all people who come for health care, for community education or for business transactions. We recognize the worth of each person, treating all with respect, compassion and dignity.

Corporate Compliance

Meriter is committed to full compliance with all federal, state and local laws. Meriter is also committed to preventing and detecting non-compliance and strives to have all compliance issues addressed and promptly resolved.

Vendors and other Meriter affiliates

It is Meriter's expectation that vendors and other Meriter affiliates, such as non-employee partners, volunteers and students, adhere to the same ethical standards and conduct expected of Meriter employees. These expectations are communicated to our business partners so that they are committed and adhere to the same standards. Questions that pertain to these ethical standards and conduct or requests for more detailed information or copies of Meriter's policies may be directed to the Corporate Compliance Department at (608) 417-5831 or (608) 417-5843.

An Ethical Place to Work

Confidentiality of Employee Information

Meriter protects the confidentiality of all employee information located in Department, Human Resources and Employee Health records and files. Employee information is strictly limited to only those individuals who have a clear work related reason to know.

Diversity

Meriter will live its commitment and continuously strive to ensure its place among the top employers in the community by welcoming and valuing the differences that make each employee unique and by ensuring a safe and comfortable environment which promotes a sense of belonging for all employees. The objective of our diversity initiative is to ensure the Meriter employee population reflects the Dane county populations and the patients we serve.

Free from Discrimination and Harassment

All Meriter employees are expected to conduct themselves and perform their jobs in a manner free from harassment. Meriter will not condone any behaviors or incidents involving employees, patients, guests, or other persons affiliated with the organization that may lead to the embarrassment or harassment of an individual, or discrimination. Meriter is committed to ensure that all employees are allowed to perform their jobs in a harassment-free environment. We encourage employees who feel they have been the victim of harassment or discrimination to report the incident to their supervisor or Human Resources immediately.

Disclosure of Conviction

Within the boundaries of antidiscrimination laws, Meriter will not knowingly employ or contract with any person whose conviction record substantially relates to their job duties at Meriter. In addition, and in compliance with the Wisconsin Caregiver Law, Meriter will not

knowingly employ or contract with any person who is expected to have access to patients, clients or residents: 1) if that person has been convicted of a serious crime as defined in the Wisconsin Statutes and Administrative Code; 2) if a unit of Government or a state agency has made a finding that the person has abused or neglected a patient, client or resident or misappropriated their property; 3) if a determination has been made under law that the person has abused or neglected a child; or 4) if that person's license or credentials are not current or are limited as to restrict the person from providing proper care to the patient, client or resident.

Nepotism

Meriter seeks to create and maintain a supportive environment for employees and their families. It is in the best interest of Meriter Health Services, Inc. to avoid situations that may lead to potential claims of favoritism, inequitable employee relations, or issues of a sexual harassment nature (quid pro quo). It is expected that executives, managers and first-line supervisors conduct themselves with the highest level of integrity by acting in a way that limits potential liabilities to the organization.

Use of Company Resources

Meriter expects all employees to use common sense and good judgment when using company resources, including information systems, supplies and equipment, and other Meriter property. Key provisions relating to the acceptable use of Information Systems include the following:

- Information accessed on Meriter systems is only that which is related and needed to the job.
- Information systems will not be used for inappropriate, unethical, illegal or criminal purposes.

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- Unauthorized software must not be stored, installed or used on any Meriter system.
 - Illegal and/or unauthorized downloading, uploading, copying or distribution of copyright or trademark materials is prohibited.

Safety and Health

Meriter is committed to providing a safe work environment and to foster the well-being and health of its employees. An essential part of all employees' job is the development of safe working practices and the observance of safety rules such as following safety warnings and directions at all times, using personal safety devices when required, and reporting any unsafe conditions to their supervisor.

Conflict of Interest

The Meriter Health Services Board of Directors has established a Board policy on Conflicts of Interest to govern disclosure of and ethical responses to potential and actual conflicts of interest. All Meriter employees shall adhere to appropriate standards of personal and business conduct so as to avoid even the appearance of impropriety. All employees have a duty to disclose potential conflicts of interest to their supervisors. A couple examples of conflicts of interest are:

- participating or influencing company transactions involving a relative
- using company information to further personal interests

Gifts and Gratuities

All employees have an obligation to conduct Meriter-related business in an environment free from influence of conflicting personal interests. Generally, a conflict of interest arises when our position or job responsibilities present an opportunity for personal gain or when an obligation or situation resulting from our personal activities and financial affairs may influence our judgement and action in the performance of our company duties. Meriter employees must maintain the highest standards of integrity and objectivity in our relationships with vendors and other contractors. Meriter employees are prohibited from accepting gifts or gratuities beyond common business courtesies of nominal value.

Government Affairs

Meriter Government Affairs Department performs lobby activities on the local, state and federal levels. The Director of Government Affairs complies with all local, state and federal laws regulating these activities. Local lobbying activities are reported to the city clerk four times per year, and state lobbying activities are reported to the State Ethics Board two times per year. Any Meriter employee who is advocating on behalf of the organization with local, state or federal elected officials or policymakers, should notify the Director of Government Affairs immediately to ensure that their activities are reported, as required.

Record Retention & Destruction

Meriter has defined appropriate minimum time periods for the retention of records and documents as well as an appropriate means of disposing of records and documents. Each department is responsible for retaining, storing and disposing of records according to the established schedule and procedure.

SECTION 2 • WHEN YOU HAVE A CONCERN

Common sense or an inner voice usually tells us when conduct is appropriate, but from time to time, the answer is not completely clear. For instance, you may wonder if your conduct on a particular issue violates Meriter policy or breaks the law. Or, perhaps, you may have seen or heard something to question the actions of someone else. In either case, it is important to discuss your concerns with someone who can provide direction.

By acting when the question first arises, you can help prevent a problem, or correct it before it gets more serious or hurts Meriter's reputation or your own. In some cases, you will receive guidance to reassure you that the situation was handled properly. Whatever the issue may be, your concerns will be addressed promptly and respectfully.

You have several options for discussing situations related to Meriter's standards of ethical conduct:

1. Talk to your supervisor, manager, director or vice president
2. Call Meriter's Corporate Compliance Department at (608) 417-5831 or (608) 417-5843
3. Call Meriter's Human Resource Department at (608) 417-6134
4. Call Alertline at 1-800-387-3069.

Alertline is a toll-free number that provides an anonymous alternative to report conditions or situations that may not feel appropriate for normal channels of communication. This line is not a general complaint or information line, but is reserved for issues related to ethical conduct. Meriter has contracted with an outside company to provide this service, and it is available 24 hours a day, 365 days a year.

When you call Alertline: A trained consultant will listen and make notes about your concerns. Calls are never recorded or traced. If necessary, the consultant may ask follow up questions to gather information. At the close of the call, you will receive an identification number and a follow up date so you can call back to check the status of your concern.

After your call: The consultant prepares a report that is forwarded to a member of the Meriter management team. Following an internal review and investigation, Meriter provides feedback to the consultant, which is shared with you if you call to check on the status. If you choose to remain anonymous, your identity is protected throughout the process.

It is your call: The Alertline is an ongoing program for concerned employees who want to remain anonymous. However, it is not a substitution for open communication between you, your fellow employees and your supervisor or another member of the Meriter management team. You are encouraged to discuss your concerns with a trusted member of the Meriter staff.

Meriter does not tolerate retaliation against any employee who reports actual or suspected violations of the law, a violation of a clinical or ethical standard, or a violation of Meriter policy. For more information on this, please refer to Meriter's Corporate policy (A-27), Whistle Blower Protection.

SECTION 3 • TRAINING AND RESOURCES

Training

Sourcenet Netlearning Modules

1. Corporate Compliance

This is a system-wide compliance education program required for all employees and it is available on sourcenet. The program provides an introduction to the Corporate Compliance Program at Meriter and basic compliance concepts for all staff to know. Additionally, each department will develop specialized compliance education as needed for department operations.

2. Confidentiality Training- The Next Chapter

This is a system-wide education program required for all employees and it is available on sourcenet. The program provides an overview of the new Privacy Regulation (HIPAA) as well as training of Meriter’s privacy policies and procedures.

3. HIPAA Security Training

This is a system-wide education program required for all employees, available on sourcenet. The program provides an overview of the new Security Regulation (HIPAA) as well as training of Meriter’s security policies and procedures.

4. Annual Confidentiality Review

This is a system-wide education program required for all employees, available on sourcenet. It is an acknowledgement of confidentiality and responsibilities.

Workshop

Compliance, Conduct & Ethics

This is a system-wide education workshop recommended for all managers. This program provides an overview of Meriter’s expectations and commitment relating to workplace ethics and compliance by reviewing and discussing case studies.

RESOURCES

Alertline: Meriter’s anonymous, toll-free hotline	1-800-387-3069
Code of Ethics Policy	Available on SourceNet
Corporate Compliance Department	417-5831 or 417-5843 Department page available on SourceNet
Diversity Initiatives	Available on SourceNet
Educational Opportunities	Available on SourceNet
Emergency and Safety	Available on SourceNet
Employee Health	417-6158 Department Page available on SourceNet
HIPAA Information Center	Information Center available on SourceNet
Human Resource Department	417-6134 Department Page available on SourceNet
JCAHO Information Center	417-6413 Information Center available on SourceNet
Manager Resource Center	Resource Center available on SourceNet
Medical Ethics Advisory Group	Available on SourceNet
Policies and Procedures	Available on SourceNet
Service Behavior Expectations	Available on SourceNet

