

Corporate Ethics and Compliance Program

Mission

The mission of the University Physicians Healthcare (UPH) Corporate Ethics and Compliance Program is to provide an infrastructure that facilitates ongoing assurance that UPH is conducting its business in an ethical manner and is complying with laws and regulations. The Corporate Ethics and Compliance Program is considered corporate policy and is supported by numerous corporate and departmental policies.

Scope

The Corporate Ethics and Compliance Program applies to the Board of Directors, employed Physicians, Employees, Volunteers, Contractors and Agents (Contractors, Subcontractors, Agents, and other persons who provide patient care items or services or who perform billing, coding or claim submission functions on behalf of UPH).

UPH Code of Conduct

The UPH Code of Conduct is designed to provide clear guidance for business conduct. Our Code reflects the Company's commitment to the highest standards of ethical business conduct in these key areas.

- **EXERCISE DUE CARE:** Conduct business honestly, in good faith and with reasonable diligence.
- **COMPLY WITH LEGAL OBLIGATIONS:** Be knowledgeable of and comply with all relevant laws, rules and regulations.
- **ENSURE ACCURATE RECORDS AND FINANCIAL INFORMATION:** Ensure that documentation is accurate and complete.
- **MAINTAIN CONFIDENTIALITY:** Protect confidential health and UPH business information.
- **AVOID CONFLICTS OF INTEREST:** Conduct business activities to avoid actual or perceived conflicts of interest.
- **COOPERATE WITH ALL INVESTIGATIONS:** Respond honestly and truthfully to all internal investigations and external agency reviews.

Vendors are an integral part of our program. If you have questions or concerns related to UPH business practices or potential violations of the Code of Conduct, please contact the Corporate Ethics and Compliance Department using one of the methods listed below. UPH policy prohibits retaliation against those who, in good faith, report inappropriate activities. UPH will sever its relationship with any volunteer or vendor who fails or refuses to act in good faith with respect the compliance duties imposed by the UPH Ethics and Compliance Program.

Our Fraud and Abuse policy can be found on the UPH internet at <http://www.uph.org/>. "About UPH", "Fraud and Abuse".

UPH's Commitment

- UPH is committed to full compliance with all Federal healthcare program requirements including preparation and submission of accurate claims consistent with such requirements.
- All UPH personnel are expected to comply with all Federal healthcare program requirements and with UPH policies regarding the operations of the Corporate Ethics and Compliance Program.
- All UPH personnel have a right and are expected to report to the Corporate Ethics and Compliance Officer or other appropriate individuals suspected violations of any Federal healthcare program requirement or of UPH policies.
- Failure to comply with Federal healthcare program requirements may result in civil and/or criminal liability. Failure to comply with UPH policies including failure to report noncompliance may result in disciplinary action up to and including termination.

When contacting the Corporate Ethics and Compliance Department ...

- ✓ All inquiries are handled in a confidential manner subject to limitations imposed by law;
- ✓ You have the option to remain anonymous;
- ✓ You will be treated with dignity and respect;
- ✓ Your question or concern will be reviewed and addressed; and,
- ✓ Corporate Policy prohibits retaliation against those who, in good faith, report wrongdoing to management or the Corporate Ethics and Compliance Department.

When providing services for UPH, your obligations' are to:

- ❖ ensure that individuals who provide patient care items or services or who perform billing, coding or claim submission functions on behalf of UPH receive a criminal background check including a search of the OIG and GSA sanction lists prior to initiating services to UPH and periodically thereafter, and disclose, in a timely manner, any debarment, exclusion, suspension or other event that makes them (i) ineligible to participate in the Federal health care programs or in Federal procurement or non-procurement programs; or (ii) if they have been convicted of a criminal offense that falls within the ambit of 42 U.S.C. § 1320a-7(a), but have not yet been excluded, debarred, suspended or otherwise declared ineligible.
- ❖ Be knowledgeable of and comply with laws or regulations;
- ❖ Seek immediate guidance when there is a question or concern regarding a potential violation of a law or regulation related to UPH business;
- ❖ Support compliance and ethics initiatives including training, investigations and the implementation of procedures to mitigate risks; and,
- ❖ Understand that ignorance of a law or regulation is not an excuse for inappropriate actions.
- ❖ Disclose convictions involving healthcare related crime or an exclusion from participation in federal programs.

UPH Corporate Ethics and Compliance Department Contact Information

24-Hour Hot Line: 1 (800) 910-6716 (No caller ID is used on the Hot Line)

US Postal Service:

University Physicians Healthcare
Corporate Ethics & Compliance Dept
2701 E. Elvira Road
Tucson, AZ 85756

Interoffice Mail:

Corporate Ethics & Compliance Dept
Elvira Road
Secure Fax: (520) 874-7072
E-Mail: Compliance@uph.org
Phone: (520) 874-3606

Any member of the Corporate Ethics and Compliance Department may be reached directly, including Patti Vignone, Corporate Ethics and Compliance Officer, by calling: **(520) 874-3606**.