



Code of Business Practice

Memorial

University Medical Center

www.memorialhealth.com

expeditions
IN ETHICS

Memorial Health Mission

With compassion, we heal, teach, and discover.

Vision

We will create a new standard for healthcare by integrating compassionate healing, lifelong learning, and scientific discovery.

Values

Trust | Respect | World-Class | Enjoyment | My Memorial



At Memorial Health, our Code of Business Practice provides us with a solid foundation for who we are, what we stand for, and how we work as individuals and professionals at one of the finest healthcare organizations in the country. Along with our vision and values, it forms the basis for our daily interaction with our patients, clients, and colleagues. It helps us to:

- Meet the needs of every patient who has placed his/her trust in us.
- Encourage cooperative relationships by building upon mutual trust and respect.
- Respect all individuals.
- Maintain personal and professional integrity in all situations.
- Keep decision-making as close to our customers as possible.
- Grow through innovation, collaboration, and partnership with those who share our values.
- Make business decisions that serve our mission.
- Be market-based and market-driven.
- Have fun!

This Code of Business Practice cannot cover every situation you will encounter. Please do not hesitate to call any of the resources available for guidance at Memorial Health.

Sincerely,

Mary Ann Bowman Beil

Vice President, Corporate Ethics & Compliance

Chief Compliance Officer

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Meeting Our Public Trust

As providers of essential products and services to the public, all Memorial Health Team Members are expected to maintain the highest standards of ethical behavior—honesty, integrity, dependability, fairness, and respect for others.

We also comply with all the laws and regulatory requirements in our rapidly changing industry.

Getting help

The Memorial Health Code of Business Practice serves as a guide for upholding our corporate values. Our principles of business conduct are described here, but the Code does not cover every situation, nor does it set forth every applicable rule. We are also guided by Corporate and Divisional policies, practices, and procedures, as well as common-sense standards and our personal commitment to ethical behavior.

An underlying theme of the Code is the prompt reporting of questions and concerns. Therefore, as questions related to ethics or business conduct arise, they should be discussed with your Team Leader, and—when appropriate—all Team Members have the option to refer questions or concerns to the corporate ethics and compliance office at 912-350-8681 or the Ethics Line at 1-800-555-8497.

Communications with the corporate ethics and compliance office will be handled in strict confidence.

Our shared obligations

As Memorial Health Team Members, it is our obligation to comply with the Code of Business Practice and its underlying policies. Violations, even in the first instance, may result in disciplinary action or termination. In addition, improper or illegal behavior must not be tolerated. No one, regardless of position, can direct a colleague to commit an illegal act.

It is the responsibility of every Memorial Health Team Leader to ensure that Team Members understand and comply with the Code of Business Practice. Each Team Leader has the additional responsibility to lead by example—observing the spirit as well as the letter of the Code and fostering a work environment that encourages ethical behavior.

If Team Members have knowledge or suspicion of any illegal or unethical activities, they should report their concerns to their Team Leader, or to the most appropriate department—risk management, legal, security, internal auditing, or corporate ethics and compliance. All telephone numbers are listed on page 14 of this document.

Using the Code of Business Practice

Guidelines

This booklet outlines some of Memorial Health's basic rules of business behavior.

It is not possible to list every scenario that you may face in day-to-day business, so please seek guidance if you have any questions.

It is important to note that the Code of Business Practice is intended to exceed the minimum standard of the law.

Note: Throughout the Code of Business Practice, the terms "system," "company," and "corporation" refer interchangeably to Memorial Health or any business unit in the Memorial Health family. This booklet is not a contract and creates no contractual relationship between Memorial Health and its Team Members.

Our Conduct and Business Practices

Integrity is essential to the performance of our duties and responsibilities. Wherever Memorial Health does business, honesty and careful observation of laws and policies are essential to our success.

Q. What is expected of me as a Memorial Health Team Member?

Team Members are expected to be on the job when scheduled and to be cooperative and helpful toward all people—patients, customers, and colleagues—at all times. We are expected to conform to corporate rules and to cooperate when the corporation is investigating work-related matters. We have an obligation to report any activities we observe to be unethical, noncompliant, or illegal.

Q. How is my personal information protected from patients and clients?

The privacy and dignity of individual Team Members is to be respected at all times. Only personal information that is necessary for effective operation of the corporation is to be acquired and retained by the corporation. Access to such information will be restricted to authorized Memorial Health personnel.

Memorial Health will comply with all applicable laws regulating the disclosure of personal information about Team Members.

Q. How is a patient's personal information to be handled? What are the guidelines for protecting our patients and colleagues?

We have been entrusted with protecting the privacy of our patients—a task that grows more difficult with the evolution of technology. Nevertheless, each of us must safeguard patient privacy when using all forms of communication—voice, data, or image transmissions.

To protect the privacy of our patients, customers, and Team Members, we must adhere strictly to the following guidelines:

- We should not discuss information from or about any patient, unless it is necessary for a patient's treatment, payment, or operations.
- We may not disclose to any person (except an authorized Team Member of Memorial Health) any information about our customers' contracts or patients' medical information. Accessing such information for personal or non-business-related reasons is prohibited.
- Without proper clearance, we may not disclose any of the information outlined above even to any law enforcement organization or other government authority. Nor may we disclose to patients and customers information concerning the issuance of a subpoena or summons for their records. If such information is requested, immediately refer the request to the office of general counsel.
- Only Memorial Health's public relations team can respond to inquiries from the media regarding a patient or any inquiry relating to the institution.
- As a Team Member with access to PHI, you can not access your own PHI and another Team Member can not authorize access to their PHI unless you are directly involved in their care.

Q. Who has access to my business e-mail?

The corporation can monitor Team Members' voice mail, e-mail, other electronic documents, and activities in the workplace for reasons including, but not limited to, system maintenance, quality control, or enforcement of the Code of Business Practice and other corporate policies.

Q. What steps can I take to protect my work documents from being accessed without my approval?

As Team Members we need to ensure that access to confidential information is protected. We can do this by not disclosing our computer passwords to anyone and working to ensure that no confidential, personal, medical, or corporate information is released to anyone without authorization. Team Members should not use equipment provided by the organization for non-business purposes. Occasional use for non-business purposes may be authorized by Team Leaders as long as it does not interfere with corporate business and is not related to outside business activities.

Q. What measures are in place for my personal protection?

Memorial Health and its Team Members are committed to maintaining a work environment free of any form of harassment. Memorial Health will not tolerate any conduct that constitutes harassment. It is every Team Member's responsibility to report any form of harassment in the workplace.

Q. What should I do if I encounter an unsafe situation?

Team Members are responsible for complying with all safety rules and regulations, including all policies outlined in Memorial Health's Safety Policy Manual. Memorial Health adheres to all state and federal regulations defining environment and safety in the workplace. If you have concerns or questions, please contact the corporate safety officer.

Q. What should I do if I think a co-worker may be drunk or on drugs while at work?

Memorial Health supports a drug-free workplace. No one may report to work or remain at work while under the influence of alcohol or drugs without a valid prescription. Contact your supervisor or human resources immediately. No drugs or alcohol may be consumed on company property, including company vehicles. The use, sale, possession, manufacture, dispensation, or distribution of any unauthorized drugs or controlled substances at any time is forbidden. Any unauthorized drugs that are confiscated by the corporation in a search of its property will be turned over the appropriate authorities. Above all and for the protection of our patients, any Team Member or member of the medical staff who appears to be impaired at work must be reported.

Q. Can we serve alcohol at a company party or special event?

When authorized by a division head or corporate officer, alcohol may be consumed at a company party. Risk management should be consulted as part of the routine planning of any event where alcohol will be served.

Accountability for Company Property

Every Team Member is responsible for the protection of Memorial Health property. In addition, we are personally responsible for company property we use as individuals.

The term "company property" refers to a broad range of assets, including all property that the corporation owns, as well as all property that is in the corporation's possession either by lease or loan. There are several categories of company property and general rules to follow to ensure the protection and appropriate use of the company's property.

Q. How can I safeguard my department from being overcharged by a vendor?

Anyone approving or certifying the correctness of any voucher or bill should know if the expense and amounts involved are appropriate. If you have questions, do not sign any documentation agreeing to a purchase or delivery without proper authorization from your Team Leader.

Q. Am I personally responsible for company property that I use at work or outside of work?

We may not take, give away, sell, receive, intentionally damage, destroy, or otherwise dispose of any type of company property, regardless of condition or value, unless specifically authorized. In addition, we may not use company property for non-corporate purposes unless specifically authorized.

Please use precautionary measures to ensure against theft, damage, or misuse of company property. For example, we should lock unattended company buildings, storage areas, and company vehicles when not in use. We may not duplicate, possess, or use keys for any company property without proper authorization. We may not alter or service equipment or facilities without specific authorization.

Q. Is there a standard procedure for recording company transactions and filing other paperwork?

Company reports include time sheets, vouchers, bills, payroll and service records, measurement and performance records, and other essential data, whether computerized or on paper.

All Team Members must follow corporate procedures for carrying out and reporting business transactions, obtaining appropriate authorizations, and complying with internal accounting controls.

There is no excuse for a false or misleading report or record. A false or misleading report or record involving corporate funds or company property is a serious matter. No one may destroy, alter, or make false entries in any corporate accounts, records, or memoranda.

Q. Is sharing company information—like patient survey results or research results—covered by any special regulations?

Ideas, information, and data are among Memorial Health’s most valuable assets. We are required, as a condition of employment, to protect this intellectual property and proprietary information of every Memorial Health company and entity. The obligation not to disclose proprietary information also applies after a period of employment with Memorial Health ends.

Patient Relationships

Q. Is it inappropriate to get personally involved with a patient or client outside of Memorial Health?

Yes, ethical relationships with patients and their acquaintances are of the utmost importance at Memorial Health. In every area of our system, our services safeguard the respect, dignity, and civil rights of our patients and clients.

Please refer to the Patient Information Guide published by Memorial Health for more detailed information specific to patients’ rights and responsibilities.

Q. What should I do if a patient, client, patient family member, or vendor gives me a gift?

Whenever a Team Member is acting on behalf of the corporation, the acceptance of gratuities—in any form—is not permitted. If a patient, client, vendor, or patient’s family member brings in cookies or something of nominal value for the whole department, you may accept this on behalf of the department and share accordingly.

Q. Are there special regulatory requirements for Memorial Health as a provider to Medicare and Medicaid patients?

Yes. Memorial Health will comply with all laws pertaining to Medicare, Medicaid, and other federally funded programs. These laws prohibit any form of payment in exchange for the referral of Medicare or Medicaid patients. They also prohibit influencing the purchase of goods or services to be paid for by Medicare or Medicaid in exchange for compensation, as well as making false claims for Medicare or Medicaid in exchange for compensation or reimbursement.

Every agreement involving a financial arrangement with a physician, their family, or other referral source must be reviewed by general counsel and corporate compliance prior to its execution.

Q. What considerations are made for admitting, transferring, and discharging patients?

Admission, transfer, and discharge policies are not based on the patient’s ability to pay. Patients whose specific condition or disease cannot be safely treated are diverted or transferred to an accepting organization in accordance with Memorial Health policies. Admission, transfer, and discharge are conducted in an ethical manner and in accordance with applicable local, state, and federal regulations.

Q. How are billing errors handled?

Billing practices are based on Memorial Health policies that ensure patients are billed only for the services and care provided to them. It is our policy to advise patients, customers, and suppliers of any clerical or accounting errors, as they become known, and to effect prompt correction of errors through credits, refunds, or other mutually acceptable means. Processes to handle billing conflicts are specific to each corporate entity.

Q. I know research is conducted at Memorial University Medical Center. Are there special rules related to this?

As a teaching medical research facility, Memorial Health is bound by regulations of the U.S. Department of Health and Human Services, the Office for Human Research Protections, and the U.S. Food and Drug Administration, which govern the conduct of research. Team Members in the laboratory, medical staff, pharmacy, administration, and any department receiving funds to conduct research must be vigilant in honoring these regulations.

The Institutional Review Board (IRB) at Memorial Health is charged with the oversight of human subject protection for all research conducted in the system. Corporate ethics and compliance and the IRB will jointly oversee any inquiry or investigation.

Conflicts of Interest

All Team Members are required to avoid conflicts of interest that can arise when personal interests influence one’s judgment or ability to act in the best interest of Memorial Health. We must not use any information acquired through our position at Memorial Health for any non-corporate purpose or personal gain. Board members, designated Team Members, and physicians are required to provide an annual summary of potential conflicts of interests.

Q. Can I conduct Memorial Health business with a company owned by a family member?

All of our work-related decisions must be based on sound management practices and not influenced by our personal relationships. We are expected to ensure that those with whom we have a close relationship are reasonably separated from our scope of supervision and from our influence in the areas of job assignment, appraisals, promotion, and compensation decisions.

Q. Can I get a part-time job even though I'm a Memorial Health Team Member?

As Memorial Health Team Members, our primary obligation is to the corporation. Any outside activity, such as a second job or self-employment, must be kept totally separate from employment with the corporation. We must avoid any activity or financial interest that could adversely affect the objectivity of our judgment, interfere with the timely and effective performance of our duties and responsibilities, or that could discredit, embarrass, or conflict with the corporation's best interests. We should not use our position, training, or experience with Memorial Health to promote off-the-job activities.

If we have an affiliation or interest in an organization or governmental body, we should disqualify ourselves from making any decision on behalf of that organization or governmental body that specifically involves the corporation to avoid any conflict of interest and damage to the corporation's reputation.

Q. What should I do if a vendor asks me to attend a social function, like dinner or golfing?

Memorial Health conducts its business by buying and selling products and providing services solely on the basis of their value and merit. When making purchasing and contracting decisions for Memorial Health, you have a responsibility that objectivity of judgment must not be compromised.

All Team Members engaged in external relationships on behalf of Memorial Health are required to observe the following general guidelines and to know and abide by any additional Memorial Health departmental rules concerning relationships with customers and suppliers.

- Team Members may offer or accept entertainment, but only if the entertainment is reasonable, occurs infrequently, and does not involve lavish expenditures. The entertainment of customers and suppliers at cultural and sporting events that are sponsored by Memorial Health is acceptable within this policy.
- Accepting or providing an occasional meal or refreshment in the nominal course of business is permitted if circumstances dictate that a business meal is necessary.
- Team Members may give or accept gifts of nominal value. An item has "nominal" value when it is promotional in nature, imprinted with corporate advertising, and typically distributed widely as a promotional item to others. Any other gift, to be considered "nominal" when it does not fit this definition, must have a retail value of \$100 or less.

Q. Is it ever appropriate to accept vendor-sponsored travel?

Yes, there are times that it may be considered appropriate to accept travel expenses from a vendor; but these occasions are rare and must be documented in writing and approved by your supervisor. Approved vendor-funded travel is allowed when the travel is a condition of a contractual relationship, provides education directly related to vendor's product, or is required to examine a product.

Q. Are government contracts and vendor relationships handled differently than non-government?

The laws and regulations that apply to relationships with government officials may differ from those that apply to relations with non-government customers and suppliers. Team Members who are responsible for establishing and maintaining relationships with government officials and employees are responsible for knowing and complying with the laws and regulations that apply to those activities.

Q. What if another health system asks me to work on a temporary basis?

We should not engage in any activity that aids a competitor of Memorial Health, although it is understood that nursing staff, physicians, and other healthcare professionals may provide services for our competitors. Generally, we should not work for anyone outside of Memorial Health in the planning, design, sales, purchase, or implementation of any service that Memorial Health provides. However, when authorized under corporate programs, such as joint-venture activities, and in accordance with applicable laws or regulations, we may provide assistance to others who may be competitors.

Q. How can I be sure to avoid a conflict of interest?

Potential conflicts of interest in contractual relations are inherent in the conduct of business. The CEO and corporate ethics and compliance officer review business relations carefully to determine the potential harm to Memorial Health and the community. Disclosure is the best way to avoid a potential conflict. Contact the corporate ethics and compliance office to discuss any potential conflict of interest.

Q. Does Memorial Health contribute to political parties or candidates?

Payments of corporate funds to any political party, candidate, or campaign inside or outside the United States are not permitted under the tax laws that govern Memorial Health as an exempt organization.

Team Members may take a personal interest in local, state, and national government and participate in political activities consistent with applicable law. Any such activities, however, may not involve the use of company time, equipment, supplies, facilities, or their public display unless authorized by the appropriate corporate officer.

Q. With regard to the claims made in Memorial Health's advertising campaigns, how are they substantiated? Don't we have to prove what we say?

Marketing practices are conducted by Memorial Health with truth, accuracy, fairness, and responsibility to patients, community, and the public. The system's marketing division adheres to the articles of the Code of Professional Standards for the practice of public relations as adopted by the Governing Assembly of the Public Relations Society of America.

Marketing materials reflect only those services available, and the appropriate level of licensure and accreditation, and comply with applicable laws and regulations of truth in advertising and nondiscrimination.

Q. Where do we obtain information about our competitors?

It is entirely proper for us to gather information about the marketplace in which we do business, including information about our competitors and their products and services. To avoid the appearance of improper agreements and understandings with our competitors, we should avoid seeking and receiving such information directly from them.

We will accept competitive information only when there is a reasonable belief that both receipt and use of the information is lawful. Shared clinical information that will benefit the community is an appropriate area for collaboration.

Regulations and Laws We Should Understand

Our policy is to understand and obey all local, state, and federal laws that apply to the areas in which Memorial Health and its affiliates conduct business. Ignorance of the law does not excuse either Memorial Health or its Team Members from an obligation for full compliance.

Seek advice from the legal department on any questions that may arise regarding these laws and regulations. The following describes some of the laws and regulations we are obligated to observe.

Q. Are there policies in place to guarantee fairness in hiring and promoting Team Members?

Memorial Health is fully committed to equal employment opportunities for all Team Members and applicants.

We have a duty to ensure that there is no unlawful discrimination in recruitment, hiring, termination, promotions, salary treatment, or any other condition of employment or career development, and that there is no harassment of any Team Member on the basis of race, color, religion, national origin, sex, age, marital status, sexual preference or orientation, disability, or status as a disabled veteran.

In addition, Memorial Health will not sponsor any corporate events that require the use of facilities, such as social or sports clubs that have restrictive or exclusionary membership policies based on race, color, religion, national origin, sex, age, marital status, sexual preference or orientation, disability, or veteran status.

Q. Are there background checks conducted prior to hiring Team Members?

Yes, background checks are conducted on all Team Members. Additionally, Memorial Health continuously monitors the exclusions list of the Office of Inspector General (OIG) and General Services Administration to assure that any owner, officer, director, Team Member, contractor, agent, or member of the medical staff has not become an "ineligible person." Any such person is required to disclose whether or not they are an Ineligible Person. If so determined, Memorial Health will remove such person from responsibility for, or involvement with, Memorial Health's business operations related to the federal healthcare programs and will remove such person from any position for which the person's compensation or items or services furnished, ordered, or prescribed by the person are paid in whole or in part, directly or indirectly, by federal healthcare programs or otherwise with federal funds, at least until such time as the person is reinstated into participation in the federal healthcare programs.

Q. Are there guidelines I should follow when working with our affiliate hospitals?

Memorial Health and its Team Members will comply with all statutes, regulatory rules, and accounting standards as they apply to transactions between and among affiliates. All affiliate transactions will be conducted and accounted for in accordance with Memorial Health's policies and guidelines.

In general, the following principles should guide all of our affiliate transactions: a) we will comply with all administrative policies, rules, and accounting requirements; b) with the exception of entities or departments specifically established to furnish services on behalf of or to other Memorial Health units, the primary business purpose of Memorial Health business units is to provide quality products and services to external customers; and c) all affiliate transactions must benefit both affiliates engaging in them, either in terms of their business strategy or expected financial returns.

False Claims Act

Q. What is the False Claims Act (FCA) and where can I find information on Team Member education regarding the FCA?

The FCA exists to fight fraud or false claims, against the federal government. A false claim may take many forms, such as overcharging for a product or service, failing to perform a service, double billing for items or services, or failing to report overpayments or credit balances.

To encourage Team Members to come forward, Memorial Health encourages prompt reporting of questions, concerns, illegal behavior, and suspected fraud and abuse. It is also the policy to inform all Team Members of their protections under the law should they need to report. All Team Members have the option to refer their concerns to the corporate ethics and compliance office at 912-350-8681 or the Ethics Line at 1-800-555-8497. Communications with this office will be handled in strict confidence.

Team Members also have the option of filing a lawsuit in the federal court system on behalf of the United States government. Information regarding Team Member education and protection can be found in the Team Member Handbook, Reporting False Claims Policy, and the Ethics and Compliance Policy on the Memorial Health intranet. These are commonly referred to as “whistleblower” protections and assures our Team Members’ concerns regarding our business practices without fear of retaliation or reprisal.

Ethics Training

Memorial Health Team Members as well as others who interface with Memorial Health professionally must complete at least one hour of annual ethics training on the Memorial Health intranet. Go to the Memorial Health intranet home page and select the NetLearning option. You will then be directed to the NetLearning Student Interface where you will be prompted to enter your login ID. This will take you to your personalized training requirements. Select the training modules related to ethics and compliance assigned to you for completion.

When these training modules have been completed successfully, you will acknowledge and complete an attestation that you have received and understand this Code of Business Practice.

Classroom Training/In-Service Classes

In addition to this Web-based training, there are routine classroom settings for corporate ethics and compliance and many in-service training options on a wide variety of subjects. Please contact 350-8681 to get a schedule or to schedule a class. If you choose to take the classroom discussion on general corporate ethics and compliance, you will still be required to complete the attestations electronically.

Telephone Numbers

Corporate Ethics and Compliance Office	912-350-8681
Ethics Line	800-555-8497
Risk Management	912-350-8253
Office of the General Counsel	912-350-8739
Security	912-350-8600
Corporate Safety Officer	912-350-8356
Human Resources	912-350-8225
Internal Audit	912-350-3314

One Last Word on Reporting

Memorial Health offers many different avenues to report your concerns. Please use any of the options summarized here.

Internal Reporting

Your supervisor – once notified, they have an obligation to report your concern accordingly in the system.

Human Resources Business Consultant (HRBC) – contact your department’s HRBC at 350-8525 for any concerns regarding your employment or treatment in the workplace.

Corporate Ethics and Compliance – you can contact this office directly at 350-8681 to report any concern or violation of our Code of Business Practice.

Ethics Line – if you encounter situations or circumstances that raise troubling legal or ethical questions, talk with your Team Leader or another manager. If you prefer to remain anonymous, call the toll-free Ethics Line at 1-800-555-8497 to address issues or concerns relating to ethical business conduct. Trained communication specialists are available 24 hours a day, seven days a week to take your call.

MAXSYS – you may also access Memorial Health’s Web-based reporting system that allows Team Members to enter incidents that occur within the organization. The incidents are reported to the risk management office. Incident types that may be entered into the MAXSYS reporting system are those related to adverse drug reactions, conduct, employee injuries, equipment, falls/slips, medications, physician rule violations, procedures, registration, and security.

External Reporting

If you or any of our patients are a Medicare beneficiary and are concerned about any issues related to care or billing, this may be reported directly to Georgia Medicare by calling 1-877-567-3095.

Joint Commission Reporting – If you or any of our patients have a concern about patient safety or the quality of care, this may be reported directly to the Joint Commission Office of Quality Monitoring by calling 1-800-994-6610 or by e-mailing complaint@jchao.org.

Patient Complaints – If you have any concerns regarding your experience at Memorial Health, please contact the corporate ethics and compliance office at 350-8681. You may also report an issue anonymously by calling the Memorial Health Ethics Hotline at 1-800-555-8497.

If you or any of our patients have an unresolved patient grievance, this may be reported directly to the Georgia Department of Human Resources Complaint Department Intake Unit at 2 Peachtree Street NW, Suite 32-415, Atlanta, GA 30303, or call 1-800-878-6422.

If you or any of our patients believe that privacy rights or protections of personal health information have been violated, this may be reported directly to the Office of Civil Rights, Region IV, Department of Health and Human Services at 61 Forsyth Street, Atlanta Federal Center, Suite 3B70, Atlanta, GA 30303-8909, or call 1-800-368-1019.

A Final Word

In summary

Memorial Health's reputation for quality and integrity is directly related to the talented, honest, diligent people on our team. The success of our organization depends in large part on continually improving our reputation for the highest standards of integrity and honesty. Healthcare companies such as ours are closely scrutinized by federal and state government regulators, competitors, and the public. Business can be won or lost based on a corporation's reputation and its actions. Strict adherence to the high standards of personal and business behavior contained in our Code of Business Practice is the only way Memorial Health will merit the confidence and support of the patients, customers, and Team Members we serve.

Certification of Receipt

Certification of Receipt

All Memorial Health Team Members, members of the medical staff, owners, directors, Board Members, contractors, subcontractors, agents of Memorial Health, anyone who provides patient care items or services or who performs billing or coding functions on behalf of Memorial Health, must sign this certificate of receipt.

_____ I am acknowledging that I have received Memorial Health's Code of Business Practice. I understand it is my duty to read, understand, and comply with Memorial Health's Code of Business Practice. If I have questions or do not understand, I will seek assistance from my supervisor or other appropriate authority.

_____ I understand my duty to report internally any evidence of wrongdoing that I identify while performing my job responsibilities.

_____ I know how to report through the proper chain of command and how to contact the corporate ethics and compliance office if necessary.

_____ I know that I can report to the appropriate federal authorities without fear of retaliation or reprisal.

Printed Name

Title

ID# (if applicable)

Department/Area

Signature

Date



Memorial

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