

Compliance Code of Conduct



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Rev. 4/2024

Although we cannot address all laws, regulations, and policies that govern our organization, this Compliance Code of Conduct outlines many issues that will be important to you when working for Baptist Health or its Affiliates.

The Compliance Code of Conduct does not replace any existing policies. It should be used to clarify our standards of conduct.

Please consult with management or refer to our formal policies and procedures for more details on specific issues.

Q: WHERE CAN I FIND A LIST OF CURRENT POLICIES AND PROCEDURES?

A: A detailed list of policies mentioned in the Compliance Code of Conduct can be found in PolicyStat or upon request to compliance@bmcjax.com.

Message from Baptist Health Leadership

Dear Baptist Health Team Members,

In carrying out Baptist Health's Mission and Values, each of us is responsible for following a high standard of individual and organizational conduct. We are obligated to comply with all applicable laws and regulations governing our health care ministry. More importantly, as a faith-based organization we must conduct ourselves with the highest ethical standards where doing the right thing is easy, the hard things are welcomed, and learning from our mistakes is embraced.

Baptist Health established the Compliance Code of Conduct to set expectations for workplace behaviors. The Compliance Code of Conduct is foundational to Baptist Health's Compliance Program and provides guidance to our Team Members, Business Partners, and physicians appointed to its hospitals' medical staffs on how Baptist Health conducts its business. Guided by our Values - Community Advocacy, Respect, Excellence, and Stewardship, the Compliance Code of Conduct reinforces what we already believe and prepares us for future challenges.

You are a key part of our Compliance Program. Concerns pertaining to practices that may violate the Compliance Code of Conduct or laws and regulations governing our health care ministry should be reported. You can raise concerns however you feel comfortable: to your supervisor, Human

Resources, or a representative from our Compliance Department. To remain anonymous, you can call the confidential Compliance Hotline at 904.202.HOTL (or 904.202.4685) or file a report at www.MyComplianceReport.com; use access ID "BMCJ". You have our assurance that you will be protected against retaliation for asking questions or for reporting possible improper conduct.

Because each Team Member upholds our Values and conducts business consistent with our Compliance Code of Conduct, Baptist Health continues to be the preferred and trusted health care partner in our community. Thank you for your commitment to bringing our Values to life by providing accessible quality health care services in an atmosphere that fosters respect and compassion.

Sincerely,



Michael Mayo
President and
Chief Executive Officer



Andrea Eklund
SVP, Compliance &
Internal Audit and
Chief Compliance Officer

MISSION

To make hope, healing, and well-being accessible to every person as an expression of God's love.

VISION

A lifetime of health, together.

Code of Conduct

Baptist Health is committed to conducting its business lawfully and ethically.

As Baptist Health's reputation is the sum of the reputations of its Team Members and Business Partners along with the physicians appointed to its hospitals' medical staffs, and all others providing services to or doing business with Baptist Health, it is critically important that they meet the highest standards of legal and ethical conduct.

To establish expectations of workplace behaviors and communicate how Baptist Health conducts its business, Baptist Health has established this Compliance Code of Conduct as the foundation to its Compliance Program.

Please take time to familiarize yourself with the information in the Compliance Code of Conduct.

Core Values



Community Advocacy

Contribute to the well-being of all community members and improve health equity through partnership, civic involvement, responsible action, and charitable service.

Respect

Foster a welcoming culture of inclusiveness and belonging that treats those we serve and each other with dignity, compassion, integrity, and respect.

Excellence

Achieve the highest quality of care and service in all we do through continuous improvement and innovation.

Stewardship

Be accountable for managing resources responsibly, efficiently, and equitably.

Quality of Care

We are committed to providing high-quality care and services to our patients, their families, visitors, and the community. Providing quality care and services keeps our patient satisfaction at the forefront in every interaction. We provide the highest quality of care in everything we do.

We Provide Quality Care and Services

- We provide treatment and medical services without discrimination.
- We listen and do our best to understand the needs of our patients, families, and visitors by promptly addressing any issues or complaints.
- We include patients in decisions regarding their medical care whenever possible.
- We ensure that clinical duties are performed by properly trained and licensed individuals.
- We conduct appropriate background checks on all Team Members and verify the credentials and qualifications of all licensed health care professionals providing services at our facilities.
- We seek opportunities to meet the needs of the indigent population of our community, subject to the availability of resources, when medically appropriate and without discrimination.



Quality of Care

- We provide the patient the freedom to choose from the available home health agencies, durable medical equipment (DME) suppliers, long-term care providers, ambulance services, and rehabilitation providers.
- We provide appropriate medical screening and necessary stabilizing treatment to all individuals who come to the hospital seeking emergency care without delay regardless of insurance status.

Q: HOW IS HEALTH CARE QUALITY MEASURED?

A: Federal and state agencies, employer coalitions, and health plans are among the organizations that monitor the quality of care we provide. Many of their findings take the form of "report cards" that measure and report on the various results that demonstrate the level of health care quality. These report cards are created to encourage patients to demand safe and effective care.



Legal Compliance

We use our resources wisely and are accountable for their proper use. We are committed to integrity in our coding, billing, and collection practices. We only bill for care and services that are appropriately authorized and documented as medically necessary.

Violations may result in severe penalties and significant fines. Any concerns regarding noncompliance shall be reported to an appropriate supervisor, Baptist Health's Chief Compliance Officer, or to the Compliance Hotline.

We Code, Bill, and Collect in Accordance with Applicable Guidelines

- We maintain honest and accurate records of all services provided to patients.
- We submit charges for only medically necessary services and products which comply with all applicable laws, regulations, and professional standards.
- We ensure bills submitted for payment are correctly coded, documented, and billed in accordance with applicable laws and regulations.
- We ensure that medical information is appropriately documented in patient records and complies with medical necessity requirements.
- We take immediate steps to correct any billing error, alert the payor, and promptly refund any payments not due in accordance with Baptist Health Policies and Procedures.

Legal Compliance

- We prevent the submission of claims for payment or reimbursement of any kind that are fraudulent, abusive, inaccurate, or medically unnecessary under the Federal False Claims Act and other state and federal laws including, but not limited to the following:
 - ◊ Billing for items or services not provided to patients.
 - ◊ Upcoding for higher reimbursement than is supported by documentation.
 - ◊ Submission of claims for outpatient services provided within 72 hours of an inpatient admission.
 - ◊ Submission of duplicate bills (more than one claim for the same service).
 - ◊ Unbundling claims (submission of bills in a fragmented fashion to maximize reimbursement if guidelines require the services be billed together).
 - ◊ Inclusion of costs that are not allowable to be reimbursed in a cost report.
 - ◊ Billing for a patient discharge when it is appropriate to bill the claim as a patient transfer.

Patient Confidentiality

We ensure the responsible use of patient, visitor, Team Member, business, or other confidential information. We are committed to complying with the Health Insurance Portability and Accountability Act (HIPAA) security and privacy standards.

We Respect and Protect Confidential Information

- We maintain the confidentiality of information about our patients and Baptist Health by using and sharing it according to applicable Baptist Health's guidelines.
- We refrain from discussing restricted or confidential business and patient information in public areas.
- We prevent others from examining, making copies of, or sharing restricted business and patient documents or information without authorization.
- We do not disclose any confidential business information, plans, or data to a third party acquired during employment with Baptist Health unless specifically authorized to do so.

All Team Members have the responsibility to keep patient protected health information ("PHI") private. Patient information must only be used, accessed, or shared within a user's job scope for business related reasons or shared when permitted by law, authorized by the patient to do so, or with approved Business Partners.

Any patient, or designee, has the right to file a privacy complaint with the Baptist Health Privacy Office or with the Secretary of the U.S. Department of Health and Human Services.



Patient Confidentiality

No member of the Baptist Health workforce may intimidate, threaten, coerce, harass, discriminate against, or take other retaliatory action against any individual or person including patients, Team Members or other workforce members who has reported a good faith privacy concern or participated in a privacy investigation.

For further information, please refer to the [Patient Privacy – Privacy Violations Policy, 6.6.2.](#)

Q: HOW SHOULD I REPORT AN ACCIDENTAL HIPAA VIOLATION?

A: Accidents happen. If you accidentally view a patient's records, if a fax is sent to an incorrect recipient, if an email containing PHI is sent to the wrong person, or any other accidental disclosure of PHI has occurred, you must report the incident to your Privacy Officer. Your Privacy Officer will need to determine what actions need to be taken to mitigate risk and reduce the potential for harm.

- Baptist Health Privacy Office
904.202.5621
- Privacy Hotline 904.202.HIPA or 904.202.4472 anonymous reporting available
- STARS via the Baptist Health Intranet Homepage
- Via email at privacy@bmcjax.com or online at <https://app.mycompliancereport.com/report?cid=BMCJ>



Data Information

Business Ethics

We conduct ourselves with integrity, honesty, and fairness to avoid any conflict between personal interests and the interests of Baptist Health. We provide health care services and conduct our business in compliance with laws, regulations, and standards that apply to the services offered by Baptist Health.

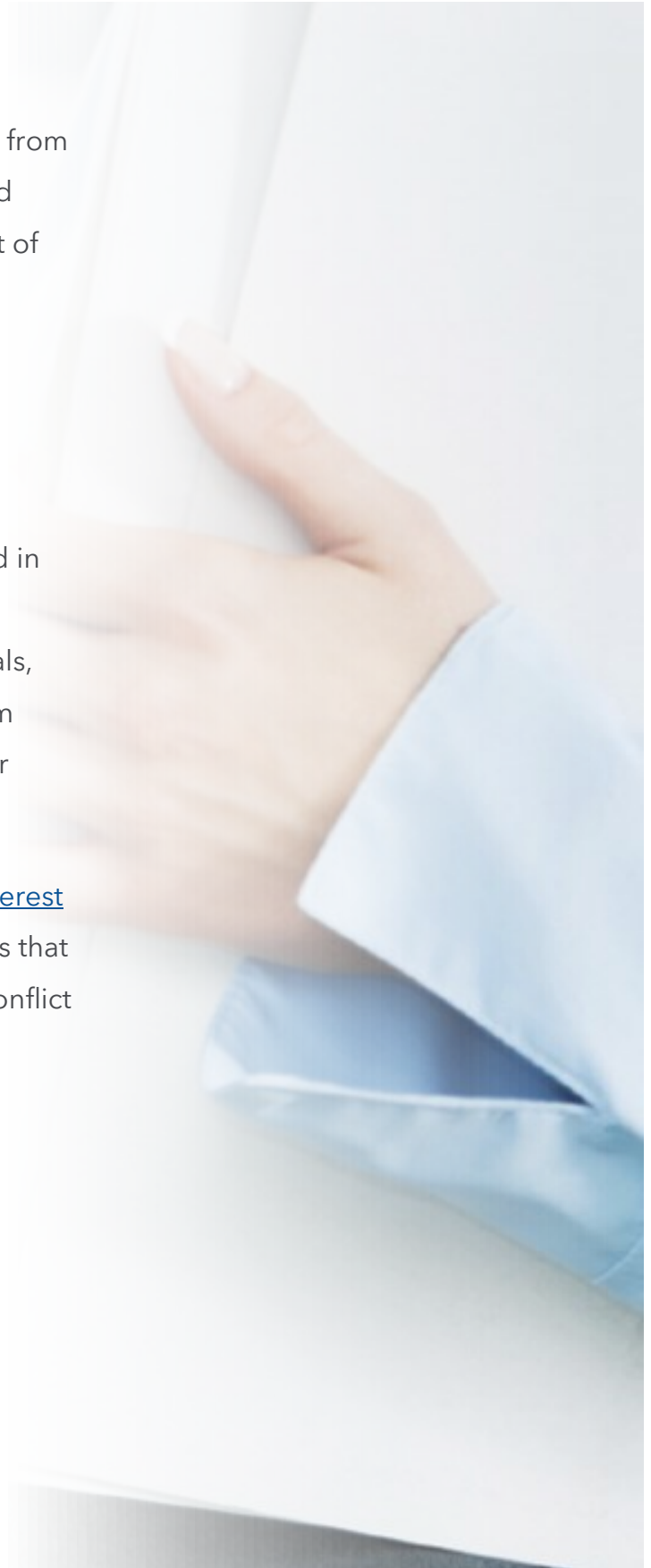
We Comply with the Law in All Business Practices

- We pursue only those business opportunities that are legal and ethical.
- We refrain from engaging in illegal business practices, including bribery, kickbacks, or payoffs intended to influence the decisions of any external representative.
- We market and advertise truthfully and accurately.
- We ensure that every contract payment or benefit paid to physicians is for specifically defined services at fair market value.
- We maintain company business records accurately and truthfully and discard them according to retention guidelines.
- We record financial transactions by generally accepted accounting principles (GAAP), established accounting policies, and internal control policies.
- We act in good faith in contractual relationships.
- We comply with copyright laws for materials such as software, printed, and audiovisual works.

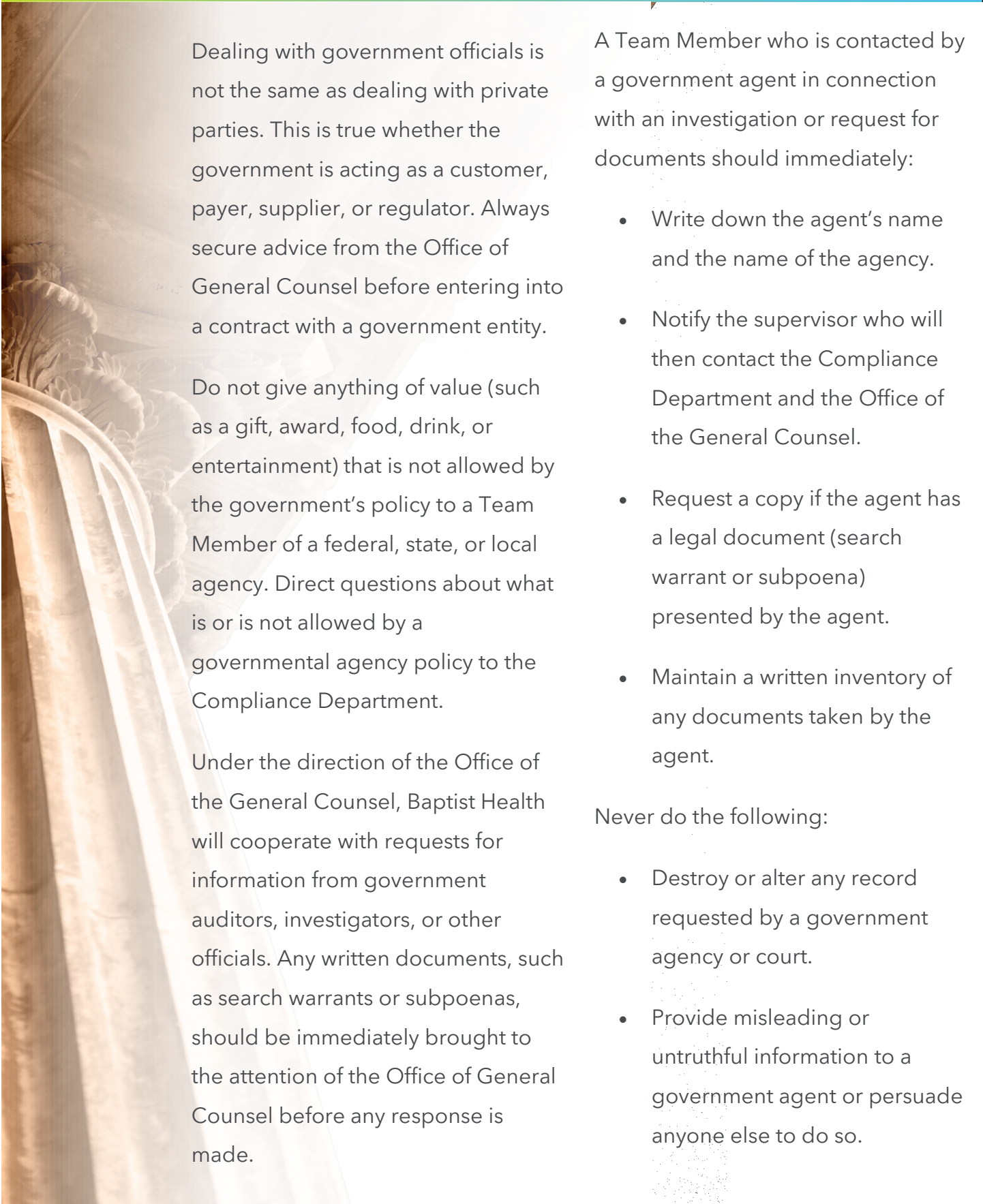
Business Ethics

We Avoid Conflicts of Interest

- We graciously decline any offers of money from patients, their family members, visitors, and others that are not intended for the benefit of Baptist Health.
- We do not provide or appear to provide payment or other benefits for referrals of patients.
- We do not accept gifts or gratuities offered in exchange for favorable treatment. We use discretion in the giving or receiving of meals, refreshments, entertainment, and gifts from patients, visitors, Business Partners, or their representatives.
- We follow the Baptist Health [Conflict of Interest Policy, 6.3.1](#) in reporting any circumstances that could cause or give the appearance of a conflict of interest.



Government Officials & Regulatory Agencies



Dealing with government officials is not the same as dealing with private parties. This is true whether the government is acting as a customer, payer, supplier, or regulator. Always secure advice from the Office of General Counsel before entering into a contract with a government entity.

Do not give anything of value (such as a gift, award, food, drink, or entertainment) that is not allowed by the government's policy to a Team Member of a federal, state, or local agency. Direct questions about what is or is not allowed by a governmental agency policy to the Compliance Department.

Under the direction of the Office of the General Counsel, Baptist Health will cooperate with requests for information from government auditors, investigators, or other officials. Any written documents, such as search warrants or subpoenas, should be immediately brought to the attention of the Office of General Counsel before any response is made.

A Team Member who is contacted by a government agent in connection with an investigation or request for documents should immediately:

- Write down the agent's name and the name of the agency.
- Notify the supervisor who will then contact the Compliance Department and the Office of the General Counsel.
- Request a copy if the agent has a legal document (search warrant or subpoena) presented by the agent.
- Maintain a written inventory of any documents taken by the agent.

Never do the following:

- Destroy or alter any record requested by a government agency or court.
- Provide misleading or untruthful information to a government agent or persuade anyone else to do so.

Workplace Behavior

Baptist Health is an equal opportunity employer. We demonstrate appropriate respect and consideration for one another and apply all Human Resources Policies and Procedures fairly, equitably, and consistently regardless of position.

Baptist Health does not discriminate or tolerate discrimination against any Team Member or applicant because of race, color, religion, gender, sexual orientation, gender identity, gender expression, veteran status, pregnancy, or any other basis protected by law. It is Baptist Health's policy to comply with all applicable federal, state, and local laws prohibiting discrimination and harassment and ensuring equal opportunity.

Baptist Health is committed to providing a work environment that respects the rights, dignity, and cultural differences of Team Members. Harassment or abuse in any form (i.e., physical, mental, or verbal) is inappropriate and will not be tolerated. We ensure the responsible use of patient, visitor, Team Member, business, or other confidential information.

Baptist Health has an obligation to our patients and to the people of our communities to ensure that Team Members are fit for duty when they report for work. For this reason, the illegal use, sale, or transfer of drugs is prohibited. Furthermore, you should not possess or drink alcoholic beverages in the workplace or report to work, in any location, under the influence of drugs and/or alcohol. A violation in this area will be dealt with in a fair and consistent manner in accordance with our [Substance Abuse/Drug and Alcohol Testing Policy, 1.2.2.](#)



Protection of Assets

We Safeguard Assets, Property, and Information

We maintain, preserve, and are personally responsible for Baptist Health assets, property, facilities, equipment, and supplies as well as the property of others.

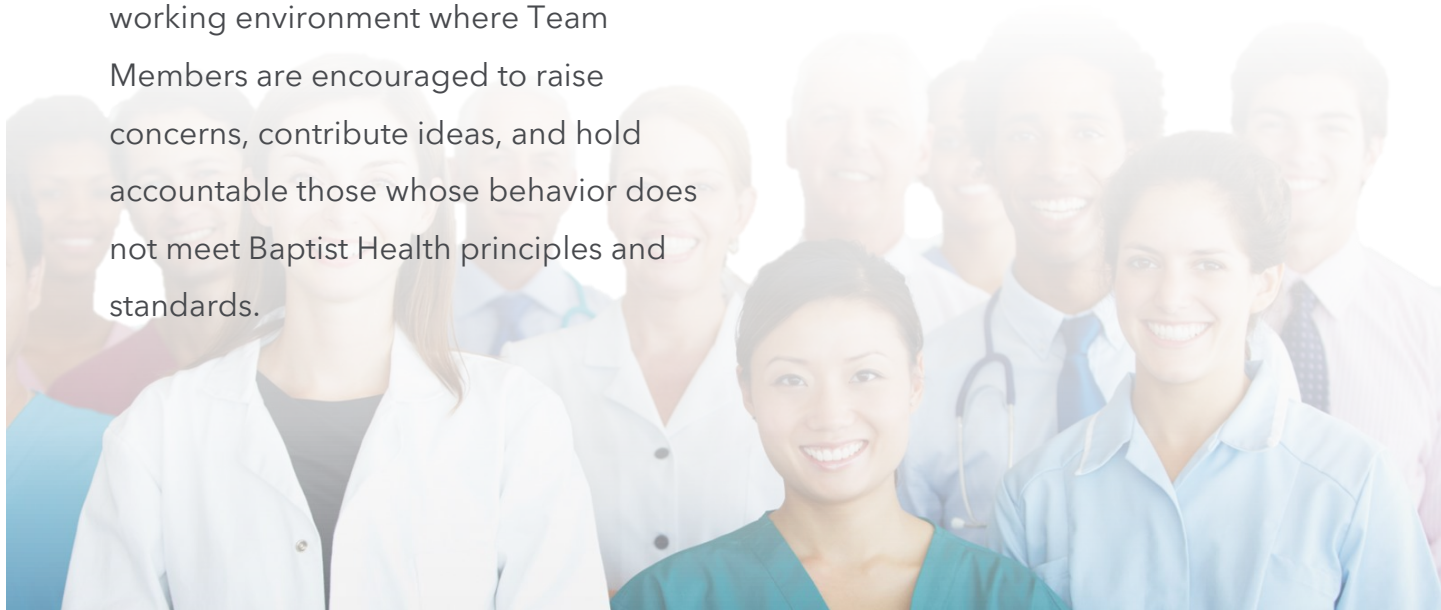
- We report time records accurately and use time at work responsibly for work-related activities.
- We ensure that property is disposed of in accordance with Baptist Health Policies and Procedures.
- We use Baptist Health email, voice mail, intranet, internet, and other present and future electronic communications responsibly and only for approved business purposes.



Leader Responsibilities

Baptist Health expects its leaders to exhibit behavior and ethics that comply with the standards set forth for Team Members. Leaders include board members, senior executives, medical staff leaders, directors, managers, and supervisors. Leaders at Baptist Health will:

- Lead change proactively and promote a culture of high ethical standards.
- Use patient-centered decision making and problem-solving.
- Drive sustainable results by supporting and promoting financial viability through financial discipline and adoption of best practices in critical patient care and business processes.
- Focus on the team and establish a working environment where Team Members are encouraged to raise concerns, contribute ideas, and hold accountable those whose behavior does not meet Baptist Health principles and standards.
- Conduct professional activities with honesty, integrity, respect, fairness, and good faith, and avoid activities that damage or demean Baptist Health's credibility and reputation.
- Not permit any abuse of power that compromises our patients or communities served.
- Respect the importance of compliance with applicable legal requirements, avoid improper exploitation of professional relationships for personal gain, and properly disclose financial and other conflicts of interest.
- Demonstrate support and fiduciary duty for Baptist Health's Mission.



Social Media

Team Members may participate in social networking sites. Team Members should consider their responsibilities in sharing and the risks of sharing certain information about Baptist Health, its patients, and Business Partners.

As an integral part of its ongoing marketing and public relations efforts, Baptist Health's Marketing and Communications Department maintains an official presence on various social networking sites, including X (formerly Twitter), Facebook, Instagram, LinkedIn, YouTube, and others as well as managing external and internal websites that encourage comments and interactions.

These sites are used in support of Baptist Health's organizational objectives including, but not limited to: promoting the health and wellbeing of the community, recruiting and engaging Team Members, cultivating relationships among donors and other key stakeholders, promoting events and services, elevating brand awareness and reputation, and sharing the Baptist Health story.

Team Members are encouraged to participate in social networking that supports our organizational objectives in a proper manner, at the proper time, and using the proper technology. Team Members must respect our critical and trusted role in patient care and ensure that any use of social networking sites does not impact their work at Baptist Health or compromise patient confidentiality.

For further information, please refer to the [Social Media Policy, 1.2.19](#).



Culture of Safety

Baptist Health encourages Team Members and Business Partners to report any concerns about their work environment, safety, patient safety, health care operations, staffing, or any other concerns related to safety or compliance using the methods described under the “Compliance Hotline” section of the Compliance Code of Conduct.

No retaliation or disciplinary action of any kind will be taken against, or allowed, for any Team Member who makes a good faith report. If any retaliation occurs, the Team Member should report their concern.

We Maintain a Safe Environment

- We recognize, report, and correct unsafe practices, conditions, or potential hazards that may violate any rule, regulation, or safety standard.
- We refrain from any threats or acts of violence and immediately report such acts or threats to a supervisor and Security.
- We read and follow policies and manufacturers’ guidelines when using Baptist Health equipment, property, and medical products.
- We use care to handle and dispose of medical waste or other hazardous materials.
- We minimize or eliminate hazards to the health and safety of Team Members, patients, and visitors.
- We refrain from using illegal drugs either on or off the job, using nonprescription controlled substances, or reporting to work under the influence of alcohol or other substances.

Q: HOW CAN I FILE A SAFETY OR HEALTH CONCERN?

A: You are encouraged to file a safety or health concern through the STARS reporting process. You also have the right to file a confidential safety and health complaint and request an OSHA inspection of your workplace if you believe there is a severe hazard or if you think your employer is not following OSHA standards. OSHA will investigate if they receive a complaint of extreme and unsafe conditions.

Protection for Reporting of Wrongdoing

Federal and state laws and Baptist Health policy provide protection to you for the reporting of wrongdoing.

The False Claims Act is a federal law that imposes liability on individuals or companies that defraud governmental programs. This law aims to reduce the waste of government money due to the submission of false claims. In health care, violations of the False Claims Act can occur when claims for payment to a Government Health Care Program (e.g., Medicare or Medicaid) are submitted fraudulently.

The False Claims Act applies when a company or individual:

- Knowingly and willfully files a false or fraudulent claim for payment to the federal government or any Federal Health Care Program.
- Knowingly and willfully uses a false record or statement to obtain payment on a false or fraudulent claim from the federal government or any Federal Health Care Program.
- Knowingly and willfully conspires with others to get a false or fraudulent claim paid by the federal government or any Federal Health Care Program.
- Knowingly and willfully uses (or causes to be used) a false record or statement to conceal, avoid, or decrease an obligation to pay or transmit money or property to the federal government or any Federal Health Care Program.

Examples of false or fraudulent claims include, but are not limited to, double billing, upcoding, unbundling, submitting, or processing claims for items or services not provided, submitting or processing claims for items or services not medically necessary, and billing for non-covered services.

Protection for Reporting of Wrongdoing

Protections for People Who Bring False Claims Act, Qui Tam Cases or Otherwise Report Suspected Wrongdoing.

Furthermore, to encourage individuals to report wrongdoing, the False Claims Act protects those who bring suit under this law (a “qui tam case”) or otherwise report wrongdoing against retaliation, including discharge, demotion, suspension, threats, harassment, and discrimination. The Sarbanes-Oxley Act protects individuals who report suspected illegal activities. There are strict criminal penalties for anyone who retaliates against another person for providing truthful information to a law enforcement officer regarding the commission or possible commission of a federal offense.

Baptist Health encourages reporting of any suspected or known activity that could result in the government being billed for false or fraudulent claims. If you feel retaliated against in any way for reporting suspected wrongdoing, that retaliation is wrong and contrary to the law and Baptist Health policies. You are requested to report the retaliation in any of the ways described in the Compliance Hotline section.

Baptist Health is committed to detecting and preventing fraud, waste, and abuse. The organization has adopted many compliance policies that are available upon request. Each Business Partner and Team Member has the responsibility to report suspected or known wrongdoing. Anyone reporting in good faith will be protected from any retaliation for their report.

Compliance Hotline

Baptist Health will not take disciplinary action or otherwise retaliate against any Team Member or Business Partner who in good faith reports a concern to management either directly or through the Compliance Hotline. Any and all forms of retaliation are prohibited, regardless of the source or type of retaliation. Furthermore, some federal Laws impose strict criminal penalties upon entities or persons who illegally retaliate against those who in good faith report wrongdoing.

Baptist Health has established a Compliance Hotline operated by an independent third-party. The 24-hour Hotline was established to enable Team Members, Business Partners, medical staff, and others associated with Baptist Health to report any concerns or suspected or known violations of law or policy without fear of retribution or retaliation.

Team Members are expected to report: (1) suspected or known illegal activity or fraud, waste, and abuse; or (2) any retaliation for the reporting of suspected or known illegal activity or fraud, waste, and abuse, through any of the following options:

1. Your supervisor or management
2. Baptist Health's Chief Compliance Officer
3. The Compliance Hotline phone number is 904.202.HOTL (4685).
4. The online reporting web address is www.MyComplianceReport.com; use access ID: BMCJ.

Reporters may remain anonymous, if desired.

