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I. <u>PURPOSE</u>

The purpose of this policy is to instruct and educate employees, affiliated physicians, agents, contractors, volunteers, and other persons performing work relating to University HealthCare Alliance ("UHA"), whether or not the person is paid by UHA, regarding the standards of conduct expected and enforced at UHA.

II. <u>POLICY</u>

University HealthCare Alliance employees, affiliated physicians, volunteers, contractors and agents are responsible for maintaining the highest ethical standards as we conduct the business of caring for our patients. UHA values integrity, honesty and fairness in all of our dealings with other employees, affiliated physicians and volunteers, our patients and their families, payers, vendors, government regulators and the public. Each employee, affiliated physician, volunteer, and agent is expected to be aware of and accountable for complying with UHA policies, as well as local, state and federal laws and regulations that are applicable to our work.

III. <u>PRINCIPLES</u>

- A. The workforce members, affiliated physicians, agents, and contractors of UHA will strive to deliver patient-centered healthcare services of excellent quality.
- B. The workforce members, affiliated physicians, agents and contractors of UHA will comply with all applicable laws and regulations that affect its various businesses.
- C. The workforce members, affiliated physicians, agents and contractors of UHA will engage only in ethical business relationships.
- D. The workforce members, affiliated physicians, agents and contractors of UHA will avoid conflicts of interest and the appearance of impropriety.

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- E. UHA is committed to timely, complete and accurate coding and billing. Affiliated physicians and mid-level billing practitioners are therefore excepted to:
 - 1. Bill only for services that are actually provided, documented and medically necessary; and
 - 2. Assign billing codes that they believe, in good faith accurately represents the services that were provided and documented for in the medical record.
- F. The workforce members, affiliated physicians, agents and contractors of UHA will protect the property of UHA and respect the property rights of others with whom we conduct business.
- G. The workforce members, affiliated physicians, agents and contractors of UHA will treat each other respectfully.

IV. <u>PROCEDURES</u>

- A. UHA shall provide the appropriate infrastructure to support the implementation of this Policy.
- B. The workforce members, affiliated physicians, agents and contractors of UHA will be provided with training regarding these principles.
- C. Adherence to the requirements of this Policy will be part of the performance evaluation process of the appropriate UHA workforce members, agents and contractors.
- D. Adherence to this policy is an expectation of those agents who contract or engage in services with UHA.