



Cheyenne Regional
Medical Center
We Inspire Great Health!

CODE OF CONDUCT

INTRODUCTION

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Cheyenne Regional Medical Center and Cheyenne Regional Medical Group (collectively referred to as Cheyenne Regional) are committed to providing quality health that is medically necessary and efficient, while adhering to applicable laws, rules and regulations, as well as the collectively agreed upon ethical standards outlined in this Code of Conduct (the Code) and in our TrueCare Standards of Behavior.

This Code applies to all board members, officers, staff, volunteers, medical staff, students, contractors and vendors (collectively: Cheyenne Regional personnel).

The Code of Conduct is intended to serve as a guide to help ensure the work and decisions we make are honest, ethical and legal and to help Cheyenne Regional personnel understand where to go for answers and internal reporting if/when an issue arises. It helps establish a road map and defines Cheyenne Regional's compliance (things we have to do) and ethics (things we should do) standards. This Code establishes a standard of conduct while also providing a framework for unique issues that need to be addressed.

If you believe you have encountered a violation of this Code or of any governing laws or regulations, you are expected to promptly report it to your supervisor, manager or the Compliance Department.

The Compliance Department is available for questions, concerns or reports of suspected issues. The most up-to-date contact information can be found under Departments > Compliance on the intranet.

If you prefer to remain anonymous, our "Report It" hotline is available at (877) 778-5463 or online at <https://www.reportit.net>. The username is Cheyenne Regional and the password is 1234.

PURPOSE

A MESSAGE FROM OUR BOARD COMPLIANCE COMMITTEE

You are working in an exceptional environment that serves a unique community. Our location, our size, the population we serve and YOU are all part of what makes us unique.

We believe the supportive and honest culture within Cheyenne Regional sets us apart from any other healthcare system. We are committed to upholding our mission to inspire great health. This is the core of our purpose—the reason we come to work. Our vision—to provide the most trusted healthcare with an inspired personal touch—is powerful, and we truly believe that you can help us continue to achieve it.

The culture that we passionately stand behind is one of quality and safety. We value caring and compassion for both our patients and one another. Listening to each other and acting with kindness and respect are attributes that continue to make our patients choose Cheyenne Regional for their healthcare.

We focus on putting service before self, teamwork, integrity and excellence to encourage superior performance throughout all of our departments.

What we do and how we act define who we are. Our reputation is extremely valuable, and your duty is to support our reputation to the highest standard possible.

We ask you to make a personal commitment to living our values at work, at home, in public and in private.

Your behavior is essential to strengthening and continually improving the environment in which we work. Together, we can make Cheyenne Regional the most trusted healthcare provider for your family and ours.



Mark T. Parsons



Pete Obermueller

COMPLIANCE PROGRAM STRUCTURE

It is the mission of the Compliance program to establish and maintain a culture within Cheyenne Regional that promotes quality and efficient patient care, high standards of ethical and business conduct, and the prevention, detection and resolution of conduct that does not conform to Cheyenne Regional's standards and policies, applicable laws and healthcare program or payor requirements. The Compliance Department oversees the Compliance program.

Specifically, the Compliance program outlines what our organization must do to comply with legal and ethical requirements, including, but not limited to, the following:

- Setting integrity standards through written policies, procedures and this Code of Conduct
- Communicating standards through awareness, education and training programs
- Providing a process for reporting potential violations of laws, policies or this Code.
- Identifying, investigating and responding to potential compliance problems
- Enforcing integrity standards and providing recommendations for disciplining non-compliant actions
- Maintaining an organizational structure that supports the furtherance of the Compliance program, including establishment of appropriate Compliance committees and appointment of a Chief Compliance Officer who has an independent reporting relationship to the Audit and Compliance Committees of the hospital's Board of Trustees

The Board of Trustees and the Board Compliance Committee provide oversight of the Compliance program and ensure that applicable laws and regulations are being followed.

The Compliance and Privacy Officer and Compliance Department are charged with the day-to-day oversight and implementation of Cheyenne Regional's compliance and privacy programs.

The Compliance Leadership Committee assists the Compliance Department with implementing compliance-related activities throughout Cheyenne Regional to facilitate an effective Compliance program.

The Ethics Committee

serves and protects the interests of Cheyenne Regional patients, visitors, employees and providers by providing resources for patients, families and our healthcare team to resolve complex issues where an ethical dilemma exists. The Ethics Committee functions only in a consultative capacity.

The Compliance Plan Document and Policy

outlines what the Compliance program does to prevent, detect and mitigate illegal and unethical conduct. A copy of both can be found on the intranet on the Compliance Department page.

The Compliance program works because Cheyenne Regional personnel are engaged and committed to their jobs at every level. It works because employees follow policies and procedures and ask the right questions at the right time. It works because employees report issues before they turn into violations.

MISSION, VISION, VALUES

MISSION

We inspire great health!
Putting service before self, our family cares for your family, with compassion, experience and innovation.
We inspire great health!

VISION

To promote the most trusted healthcare with an inspired personal touch.

VALUES

Respect, Caring, Integrity, Excellence, Compassion, Service, Teamwork

CARING

TRUECARE BEHAVIORAL STANDARDS

Teamwork – Moving together toward excellence. Share talents, information and work. Engage with others in the organization. Go beyond expectations and anticipate needs. Be flexible with time. Join committees to make a difference.

Recognition – Say thank you to someone every day. Manage others up. Genuinely say thank you often. Celebrate the efforts and achievements of others.

U-You – You are Cheyenne Regional: Own it. Be trustworthy and respect confidentiality. Show pride in your work and team. Focus on the success of yourself and your organization. Be on time. Present a positive image and attitude.

Excellence – Create a culture of always. Believe in Cheyenne Regional. Participate in performance improvement. Be consistent in all you do. Commit to best practices. Find ways to say, “yes.” Make safety a priority, always.

Communication – Keep it open, keep it constant. Use positive words. Always use MAIDET (Manage up, Acknowledge, Introduce, Duration, Explanation, Thank You). Acknowledge everyone with a smile. Listen to others. Respond to others in a timely manner. Read organizational communications. Always engage patients and guests.

Accountability – Lead by doing. Own what you do. Do the right thing, always. Be open to change. Uphold organizational policies and procedures.

Respect – Respect yourself, your surroundings and the organization—let that respect be seen every day. Respect your workplace, keep it clean. Make new staff members feel welcome. Respect yourself, be professional. Escort people personally to their destinations. Treat patients, guests and co-workers with respect. Show consideration for the work of others.

Education – Approach each day as a learning opportunity. Share your experience/knowledge. Keep current on best practices. Complete required ongoing education. Assist others in professional growth. Welcome each learning opportunity.

ANTI-VIOLENCE AND ANTI-HARASSMENT POLICIES

Cheyenne Regional is committed to maintaining an environment that is free of workplace violence. Workplace violence includes, but is not limited to, physical assaults or statements that give a person reasonable cause to believe their personal safety or the safety of others is at risk. Cheyenne Regional will also ensure that its personnel are not subjected to harassment or demeaning behavior from colleagues, providers, vendors, patients or families. If you see or experience such behavior, you are obligated to promptly report the incident to Human Resources or the Compliance Department. Cheyenne Regional's Workplace Violence Prevention program was developed to help ensure our staff, patients and visitors are safe. Many violent incidents originate from patients. In these cases, patients may be scared, irritated, not feeling well and/or feeling helpless.

In order to align with our behavioral standards, we encourage empathy and compassion toward these patients. However, our priority is the safety of our valuable employees.

If you feel you are in an escalating situation, find a supervisor to assist you. If you feel you are in a dangerous situation, go to a safe location and call Security. Cheyenne Regional will not tolerate violence directed at any of our staff, providers, vendors or patients.

Please refer to our "Workplace Violence" training module to learn more about techniques to use with patients who become violent.

WORKPLACE HEALTH AND SAFETY

In our continuing commitment to a healthy and safe environment, Cheyenne Regional employees are expected to leave all weapons and dangerous items, including knives and guns, at home. We expect the same of our patients and visitors, and if such items are discovered, they may be confiscated until the owner leaves the premises.

The use of illegal drugs and abuse of controlled substances in the workplace are prohibited. Cheyenne Regional has a drug and alcohol policy with which all personnel must comply. Lack of adherence may mean the employee will face corrective action, possibly resulting in termination of employment.

NON-DISCRIMINATION

Cheyenne Regional is an equal opportunity environment. Personnel shall not discriminate against any individual on the basis of race, color, religion, sex (including pregnancy, sexual orientation or gender identity), national origin, disability, age (40 or older), genetic information (including family medical history), military status, veteran status, political affiliation or disease state.

NON-RETALIATION

Cheyenne Regional has a strict non-retaliation policy. Personnel shall not retaliate against other Cheyenne Regional personnel, patients, or others for reporting any issue or concern, in good faith. If you feel you are being retaliated against, contact Human Resources or the Compliance Department.



TEAMWORK

PERSONAL USE OF CHEYENNE REGIONAL RESOURCES

Our organizational assets and resources are to be used strictly for furthering our mission. It is the responsibility of Cheyenne Regional personnel to preserve our organization's assets, including time, materials, supplies, equipment and information. Cheyenne Regional assets are to be maintained for business-related purposes; personal use of any Cheyenne Regional asset without supervisor's prior approval is prohibited. The occasional use of some items, such as copying equipment or telephones, where the cost is insignificant, is permissible. Any community or charitable use of organizational resources must be approved in advance by an executive. Any use of organizational resources for personal financial gain is prohibited.

INTERNET / EMAIL ACCESS

Cheyenne Regional will issue you an official Cheyenne Regional email account to be used for business communications within and outside the organization, and all emails are the property of Cheyenne Regional. You are responsible for the appropriate use of your email account. All personnel are expected to use this email for any communications containing Protected Health Information (PHI), to ensure compliance with HIPAA regulations.

Cheyenne Regional has the right to access, monitor and disclose contents of internet, email, faxes and voicemail made through Cheyenne Regional-owned equipment and systems.

Employees may not use internal communications to post, transmit, download or distribute any material that is illegal, threatening, discriminatory, obscene, malicious or knowingly false.

Internet access is a privilege that is monitored. We understand small breaks are necessary during a work shift and allow limited personal use of the internet. Internet privileges may be reviewed and revoked by your supervisor or manager if internet use is deemed excessive or inappropriate.



WORKING TOGETHER

- Stay positive.
- Don't be a grump.
- Offer to help.
- Don't gossip.
- Be fair with your disagreements.
- Own your mistakes.
- Don't panic from others' mistakes.
- Take feedback & criticism gracefully.

RESPECT

PROFESSIONALISM

Our organization is committed to providing an environment where everyone is treated with honesty, fairness, dignity and respect.

We value the diversity of our community, both internally and externally, and expect personnel to initiate an inclusive environment. The relationships we build with our peers, co-workers and fellow employees are reflected in our interactions with the community we serve.

Be conscientious of how you present yourself, both professionally and personally. Dressing appropriately for your job is a Cheyenne Regional policy. This includes wearing a name badge that is clearly displayed so patients can quickly and easily identify you.

Cheyenne Regional is a smoke-free campus to help ensure the health and well-being of our patients, visitors, employees and others. We expect our team members to be free of the smell of smoke. Cheyenne Regional employees are encouraged to respectfully communicate this policy to visitors and patients.

You are expected to maintain professional composure despite stress, fatigue, professional pressure or personal issues. Notify your supervisor if something is interfering with your ability to perform your assigned tasks effectively, safely and to the best of your ability.

You may be exposed to situations and information that are confidential. You are expected to maintain confidentiality of patient information, employee information, business information, intellectual property and trade secrets.

If you are experiencing problems with your peers or supervisor that you are unable to resolve using open communication, we encourage you to contact Human Resources for assistance.

TIPS FOR TALKING WITH AN ANGRY INDIVIDUAL

1. Refrain from speaking. Stay calm and listen.
2. Let them vent. Try not to interrupt, even with a solution, until they have said their piece.
3. Bring it down a notch. Speak softly to diffuse the situation.
4. Acknowledge why they are upset. Active listening can help calm down the individual.
5. Give them options. Tell them what you can and cannot do for them.
6. Set your limit. You do not have to tolerate being yelled at or threatened.

CONFIDENTIALITY AND PRIVACY OF PATIENT INFORMATION

Cheyenne Regional personnel are required to keep patient information confidential because we are trusted by patients and their families with highly personal and sensitive information regarding their medical condition. Federal and state laws govern the privacy of our patients and their health information, including patient information that is spoken, written or in electronic systems. These laws apply to the organization, as well as to you as an individual, even after you no longer work here. Patient privacy laws include serious consequences for failing to protect patient privacy, including potential fines, imprisonment, loss of your professional license and a patient's right to sue both the organization and you personally. Additionally, violating our privacy policies can lead to disciplinary actions, up to and including termination. Our Compliance Department monitors electronic patient records to determine who is accessing the records and whether the access is consistent with job functions.

HIPAA (The Health Insurance Portability and Accountability Act of 1996) is a guide that helps us know what patient information can and cannot be shared. Complying with our privacy policies includes the following:

- Access, use and disclose only the minimum amount of patient information needed to perform our jobs.
- Do not discuss patient information with others who do not have a job-related need to know, including co-workers, colleagues, family and friends.
- Do not share user IDs or passwords to our electronic systems and log off when stepping away from our computers; what is done under your ID/password is your responsibility.

- Assess your surroundings when speaking with or about patients and speak quietly, always asking the patient for permission to speak to them about their care when family or friends are present.
- Do not mention or make reference to any patients whatsoever on personal social networking sites or blogs.
- Verify written patient information to ensure that we do not mix one patient's information with another's, that fax numbers are accurate and entered correctly before sending, and that patient labels are correct.
- Dispose of written patient information in confidential disposal bins and contact IT for proper disposal of electronic patient information.
- Only use hospital-approved personal devices, flash drives or cameras to store, download or capture patient information, including photographs.
- Report all privacy concerns or potential privacy policy violations immediately to our Compliance Department.



ELECTRONIC HEALTH RECORDS (EHRs) ARE MONITORED AND AUDITED.

Accessing, viewing or discussing patient information unnecessarily is grounds for corrective action—up to and including termination of employment. Unnecessary involvement includes cases in which you are not directly involved in providing care, are not properly trained to utilize, or are not otherwise professionally, operationally or legally allowed to view.

Expectations:

- Speak with awareness and respect when discussing patient information. Treat a patient's PHI as if it were your own information.
- Only give information that is minimally necessary to complete the task, and only access information that is necessary for you to do your job.
- Do not provide patient information to individuals who do not need to know. This includes your co-workers, family and friends.
- Do not give your user ID or password to anyone or allow anyone to perform work under your login information.
- Adhere to Cheyenne Regional privacy policies and procedures, available to employees on the intranet.
- If you suspect a HIPAA violation, it is your duty to report it to your supervisor and/or the Compliance Department.



HELPFUL TIP

Think about patient privacy in terms of your information when you are a patient. What are your expectations? Treat patients the same as you would want to be treated.

COMPASSION

PATIENT RIGHTS AND RESPONSIBILITIES

We encourage patient and family involvement in all aspects of care. Patients have certain rights and responsibilities that are fully supported by the Board of Trustees, Hospital Administration and the Medical Staff of Cheyenne Regional. A list can be found in the Patient's Rights and Responsibilities Policy, on Cheyenne Regional's website. Patients are also offered a list of their rights and responsibilities upon admission. Cheyenne Regional personnel are expected to adhere to these rights.

ACKNOWLEDGE AND RESPOND

Communication is key to working together as a cohesive team. Cheyenne Regional highly encourages productive, positive and truthful communication.

This includes recognizing and encouraging positive behavior and not making offensive or judgmental comments toward or about staff, patients or visitors.

It is also important to pay careful attention to our patients' experiences. This includes being mindful of what you say and how you act and trying to understand what each patient is experiencing. Little things like helping with directions, walking the patient to his or her destination, making eye contact and greeting the patient with a warm expression are all simple and effective ways to help our patients feel welcome.

MAIDET

PRACTICE MAIDET EVERY DAY.

- M – Manage Up
- A – Acknowledge
- I – Introduce
- D – Duration
- E – Explanation
- T – Thank you

PATIENT SAFETY AND QUALITY

At Cheyenne Regional, we strive to provide high-quality patient care that is:

- **Safe** – avoiding injuries to patients from the care that is intended to help them
- **Effective** – providing services based on scientific knowledge, best practices and cost-effectiveness
- **Patient-centered and Family-centered** – providing care that is respectful of and responsive to individual patient and family preferences, needs and values, ensuring that patients' values guide all clinical decisions
- **Timely** – reducing wait times and sometimes harmful delays for both those who receive and provide care
- **Efficient** – avoiding waste, including waste of equipment, supplies, ideas and energy
- **Equitable** – providing care that does not vary in quality because of personal characteristics such as gender, ethnicity, geographic location, socio-economic status, sexual orientation or perceived disability

Cheyenne Regional is committed to providing clear, accurate, honest and transparent information about the care we offer so that patients can make informed healthcare decisions.

We are committed to quality of care and patient safety. Cheyenne Regional has programs to measure and track certain quality and safety measures and seeks to establish best practices throughout our programs and services.

Cheyenne Regional personnel are expected to meet and are encouraged to exceed the standards of care at Cheyenne Regional and are required to participate in achieving quality and safety goals.



HAND HYGIENE

The expectation is to scrub hands for a minimum of 20 seconds. Try singing the alphabet before rinsing.

EXCELLENCE

POLITICAL CONTRIBUTIONS AND ACTIVITIES

As a not-for-profit organization, Cheyenne Regional is regulated regarding political lobbying activities that it may conduct. To maintain our tax-exempt, not-for-profit status, Cheyenne Regional cannot campaign or lobby for or against a particular candidate or issue.

As individuals, we may exercise our civil liberties by participating in, advocating for or supporting political candidates and causes of our choice outside the workplace. Employees are not allowed to campaign, debate or advertise for political issues or campaigns using Cheyenne Regional-issued systems, equipment and machines, including email, photocopying, etc.

Cheyenne Regional lends support to issues that will create a positive impact on the health and well-being of the population we serve and to oppose issues that do not.

Cheyenne Regional highly encourages employee interaction with the community and our government on personal time (not only as a representative of Cheyenne Regional). Vote, join committees or boards, and be an active part of our community!

DISTRIBUTION AND SOLICITATION

Except for activities related to approved Cheyenne Regional programs, employees may not verbally solicit or distribute written materials requesting others, including employees and patients, to join or contribute to any organization, fund or activity during working hours. This includes in hallways, stairways and elevators. Working hours do not include break periods, meal times or time before or after an employee's shift. Employees may engage in solicitation or distribution of materials in cafeterias, vending areas, parking lots, lounges or locker rooms.

LICENSURE AND CERTIFICATION

Credentials communicate to our patients that we are qualified to do our jobs. Employees and independent contractors who require professional licenses, certifications or other credentials to perform their job duties at Cheyenne Regional are responsible for maintaining their credentials and providing a copy of their current license, certification or other required credentials to the Human Resources Department. Clinicians with lapsed or revoked credentials are not allowed to care for patients.

HONEST MARKETING

Cheyenne Regional is committed to providing honest communication to the public we serve. Marketing efforts shall accurately reflect Cheyenne Regional's abilities, either directly or contractually, to care for, treat and serve our patients. Our Scope of Services policy provides a list of patient care areas within Cheyenne Regional and outlines the types of procedures, patient population and the extent and types of services we offer our patients.

CONTACT WITH TRADITIONAL MEDIA

Cheyenne Regional is committed to responding cooperatively, consistently and honestly to all potential media events and/or inquiries. Employees must contact the Marketing and Communications Department for any media inquiries or for initiating contact with the media. Additionally, communications with the media regarding patient information must comply with federal and state privacy laws in order to fulfill our legal and ethical duty to protect patient privacy.

USE OF SOCIAL MEDIA

Cheyenne Regional has an ethical, business, legal and regulatory responsibility to protect the confidentiality and proprietary information of its patients, employees and our organization as a whole. Mentioning or making references on social media about patients—no matter how vague—is inappropriate and considered a violation of patient privacy and of Cheyenne Regional policy.

SERVICE

GOVERNMENT SURVEYS AND INVESTIGATIONS

Cheyenne Regional is regulated by federal, state and local laws and regulations. To ensure that we are complying with applicable rules and regulations, we promptly respond to requests for information pursuant to an investigation or legal proceedings. Regulatory agencies may come into our facilities in the course of performing an investigation. If any regulatory agency is present in our facilities, Administration and the Legal Department should be notified immediately.

As a Cheyenne Regional employee, you may have to cooperate with an investigation or survey. Investigators have the right to contact you at work or at home. You should consult with the Legal Department prior to speaking to a government investigator. You have the right to decide where the interview will take place. If you have any concerns regarding investigations, please feel free to contact the Compliance Department or talk with your supervisor. Cheyenne Regional expects honesty from employees, and participation in an investigation or survey will not negatively affect your job.

EMERGENCY TREATMENT

Cheyenne Regional abides by to the requirements of the Emergency Medical Treatment and Active Labor Act (EMTALA) in providing a medical screening and stabilizing treatment to all patients who come to the hospital for emergency treatment or who are in labor, regardless of the patient's ability to pay or insurance status. Patients with emergency medical conditions should only be transferred to another facility at the patient's request, or if we do not have the capacity or capability to meet the patient's needs. Such transfers must be in compliance with state and federal EMTALA requirements.

CONFLICT OF INTEREST

A conflict of interest involves any circumstances where your personal activities or interests are advanced at the expense of Cheyenne Regional. These circumstances may be financial or involve some other type of personal interest that conflicts with your professional responsibilities. Conflict of interest can often be avoided or mitigated when Cheyenne Regional is aware of potential conflicts. We are required to follow the Conflict of Interest policy and disclose all information about any actual or potential conflicts of interest, at the time of hire and annually.

ACCEPTANCE OF GIFTS

We strive to maintain high ethical standards regarding the offering and acceptance of gifts. The appropriateness of offering or accepting gifts depends on the specific circumstances of the gift and who is offering or receiving it. However, solicitation of gifts, no matter how small, is unacceptable within our organization. Consult with the Compliance Department if you are offered a gift or are considering giving a gift.

Gifts to Patients

Cheyenne Regional may not induce Medicare, Medicaid or other state or federal healthcare beneficiaries to use our services by offering gifts that would likely influence them to obtain services from our organization. Cheyenne Regional personnel shall not waive or discount government beneficiary co-pays unless such discount complies with Cheyenne Regional's Financial Assistance program and/or policy. Cheyenne Regional personnel shall not offer any other discount, gift, free items or services, or other inducements to government beneficiaries without first obtaining approval from the Compliance Department.

Gifts from Patients

Patients may wish to give their caregivers gifts to thank them for the care they received. Patients and their families who want to do this should be encouraged to give gifts to a group of caregivers rather than an individual caregiver. Nominal gifts such as food, flowers or candy are generally considered acceptable. Cash and equivalent gift cards should not be accepted. Individuals who insist on giving monetary or valuable gifts (more than \$15) should be directed to Cheyenne Regional's Foundation.

Vendors and Suppliers

There are significant ethical limitations regarding the acceptance of personal gifts from vendors and suppliers. Acceptance of a gift should in no way influence your ability to provide care in the best interest of the patient and shall not be accepted if business contracts or renewals are currently under negotiation. Meals may only be provided as part of educational presentations. Invitations to social events should be reasonable and professionally appropriate and should not exceed \$75 per person annually, per vendor. Travel expenses covered by vendors, even for educational purposes, must be considered on a case-by-case basis with assistance from the Compliance Department and in reference to the Gifts policy.

Our organization may not accept donations or other charitable contributions from vendors and suppliers in exchange for any business. All gifts and other donations from vendors/suppliers should be referred to the Cheyenne Regional Foundation. The Foundation will process gifts as donations in compliance with applicable laws and policies.

INTEGRITY

EXPECTATIONS FOR RECORDS, CODING AND BILLING

Cheyenne Regional maintains a high standard of accuracy and completeness in the documentation and reporting of all records, including financial and patient records. It is our duty to create and maintain accurate and complete records and to only destroy organizational records in compliance with federal and state laws and applicable policies. Our policies provide guidance on the proper creation, amendment, maintenance, retention and destruction of organizational records and documents. Contact the Compliance Department for additional guidance.

Cheyenne Regional strives to ensure that billing to the government, third-party payors and patients are accurate and conform to all applicable federal and state laws and regulations, and that they accurately reflect the services rendered to the patient. Coding is how we identify and classify health information, such as diseases and procedures, based on the care provided and documented in the patient's medical record. Using these codes in the billing process is how we identify charges for services we have provided.

- Billing codes are expected to be assigned according to proper and complete documentation, as regulation and guidance require.
- If we make an error in a bill or a claim, the Compliance Department and the appropriate department director(s) will determine what actions must be taken. This may include resubmitting, refunding, notifying patients and government authorities, developing new/ revised policies or procedures and providing additional team training.

COMPLIANCE WITH CHEYENNE REGIONAL POLICIES

Cheyenne Regional personnel are responsible for complying with all applicable Cheyenne Regional policies and procedures, including, but not limited to, those policies and procedures relevant to the Compliance program. Policies are located on Cheyenne Regional's intranet.

COMPLIANCE WITH FEDERAL HEALTHCARE LAWS

The Compliance Department monitors violations of federal laws and regulations related to the following areas: the False Claims Act, Anti-Trust laws, Anti-Kickback and STARK, and Excluded Providers. Any concerns or questions relating to the above federal laws and regulations should be directed to the Compliance Department.

False Claims Act

The False Claims Act and the Federal Deficit Reduction Act help to preserve the integrity of government programs such as Medicare and Medicaid from fraud and abuse. It is a violation of the False Claims Act to knowingly submit, or cause another person or entity to submit, false claims for payment of government funds. Additionally, the State and Federal False Claims Acts contain provisions that allow individuals with actual knowledge of alleged false claims to sue on behalf of the government, as well as provide protections against retaliation for individuals making a false claims action.

We are committed to submitting claims that are accurate and truthful. If you know of a false claim, contact our Compliance Department immediately or call the Compliance hotline to provide an anonymous report. Failure to notify the Compliance Department may lead to disciplinary action, up to and including termination of employment.

Anti-Trust Laws

Anti-trust laws concern the sharing of information or contracting that could manipulate the marketplace. As such, contract specifics and prices charged for any goods and/or services should not be discussed with outside parties.

Anti-Kickback Law and STARK

The federal Anti-Kickback Law prohibits individuals and organizations like Cheyenne Regional from knowingly or willfully offering or paying, directly or indirectly in any form or remuneration, in return for or to induce the referral of patients or business that is covered by Medicare or other federal or state healthcare programs to our facility.

Additionally, Cheyenne Regional does not place restrictions or qualifications on our physicians' referral patterns. Gifts offered to physicians or their family members should be discussed in advance with the Compliance Department.

Excluded Provider

Cheyenne Regional does not employ or contract with individuals or organizations that are excluded, suspended or otherwise ineligible for participation in federal healthcare programs. Our organization conducts initial excluded parties checks, excluded provider audits and a review of the Office of the Inspector General's report as part of the measures we take to ensure payments are not being provided to excluded providers.

GIFTS TO PHYSICIANS AND OTHER REFERRAL SOURCES

Federal and state laws affect contracts, agreements and other financial relationships with physicians, practitioners, vendors and other referral sources. As a workforce member of Cheyenne Regional, you may not enter any contract or other financial arrangement with, or give or receive anything of value to or from, an outside physician, a physician's family member or other referral source without the prior approval of the Chief Legal Officer and/or the Compliance Officer.

Cheyenne Regional personnel are required to comply with the terms of any approved contract or other financial arrangement with outside physicians, their family members or referral sources. Failure to perform or improperly change contracts or arrangements may violate applicable laws.

RESOURCES AND REPORTING

This Code should to be used as a guide if you are confronted with a situation that raises questions about ethical or other conduct. If you suspect or are aware of a potential violation of any law, regulation, Cheyenne Regional policy and/or this Code, it is your duty to report it to your supervisor and/or the Compliance Department. If you are uneasy talking to your direct supervisor, voice your concern to the next supervisory level, up to and including the highest level of management. Cheyenne Regional encourages open and honest discussion of issues with management. We are committed to providing an environment that allows reporting in good faith without fear of retaliation. However, good faith and self-reporting will not excuse potential corrective actions if you played a role in the violation.

All reports are confidential and will be shared with others only on a need-to-know basis. The findings of a compliance investigation are confidential to protect all involved in the investigation process. As a result, details and specific findings of a compliance investigation will be shared only on a need-to-know basis. The Compliance Officer ensures that all reports will be thoroughly and fairly investigated and that appropriate action will be taken.

If you feel you are experiencing retaliation because of a report, please contact the Compliance Department immediately. Penalties for retaliation can be severe.

When you call to report an issue or send an email through the "Report It" hotline, your report will be reviewed by the Compliance Officer and appropriate action will ensue. Please provide as much information as possible, especially if reporting anonymously. We try to respond to all reporters; however, because of the sensitive nature of many reports, we may not be able to inform you of the specific resolution. The Compliance Department will contact you if we need to interview you directly. We try to maintain confidentiality whenever possible and will notify you in advance if your identity will have to be revealed as a result of an investigation. Please know that we take all reports seriously.

CONTACTING THE COMPLIANCE DEPARTMENT

Current Compliance contact information can be found on the Cheyenne Regional Intranet: <http://intranet/departments/compliance/>.

- **Compliance and Privacy Officer:** (307) 432-6625
- **Compliance Fax:** (307) 432-6626
- **Information Security Officer:** (307) 633-7171

IF YOU PREFER TO REMAIN ANONYMOUS

You can call the Compliance Hotline at (877) 778-5463 or visit the website at <https://reportit.net>.

The username is Cheyenne Regional and the password is 1234 (not required to leave a report).



Cheyenne Regional
Medical Center

We Inspire Great Health!

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