



**Baptist Health
South Florida**

BAPTIST HOSPITAL OF MIAMI • SOUTH MIAMI HOSPITAL • DOCTORS HOSPITAL
BAPTIST CHILDREN'S HOSPITAL • HOMESTEAD HOSPITAL • MARINERS HOSPITAL
BAPTIST OUTPATIENT SERVICES • BAPTIST CARDIAC & VASCULAR INSTITUTE

Code of Ethics

A Guide to Ethical Standards



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www.baptisthealth.net

A GUIDE TO ETHICAL STANDARDS AT BAPTIST HEALTH SOUTH FLORIDA

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INTRODUCTION TO BAPTIST HEALTH'S CODE OF ETHICS

Baptist Health is committed to excellence in customer service, sensitivity to customer needs, and delivery in an ethical, professional and legal manner of high-quality healthcare services to our communities. Baptist Health's Code of Ethics has been adopted as a general guide in carrying out this mission. Baptist Health values every employee. In return, each employee is asked to value Baptist Health by understanding and meeting the standards in Baptist Health's Code of Ethics.

Baptist Health's Code of Ethics is a key part of the Corporate Compliance Program that has been implemented by the health system. It reflects the core values and principles that guide Baptist Health operations.

The purposes and objectives of the Code are to:

- Establish a code of ethical standards and procedures to be followed by all employees;
- Communicate to all employees the standards and procedures they are expected to follow;
- Clarify methods of reporting issues and concerns within the corporate structure in order to prevent, detect and correct violations of laws, regulations and corporate policies that would detract from Baptist Health's Code of Ethics; and
- Document Baptist Health's commitment to high professional standards.

Baptist Health's Code of Ethics must be observed by all Baptist Health employees. In order to prevent and detect violations of the Code, many initiatives throughout our organization form Baptist Health's anti-fraud program. No one, regardless of his or her position, will be allowed to compromise adherence to this Code. Failure to comply is a serious matter that may lead to disciplinary action up to and including termination. Employees who violate a specific law may be subject not only to disciplinary action, but legal prosecution as well. If there are any questions about this Code or any company policies or practices, you should ask your supervisor, manager, director, Human Resources representative, the Legal Department or the Audit and Compliance Department. If any employee is not satisfied with the response received concerning application of the

Code, he or she is encouraged to continue raising the concerns to the highest levels of management without fear of retaliation or retribution for reporting the issue.

You are ethically bound to report to your supervisor, the Human Resources Department, the Legal Department, the Audit and Compliance Department and/or any vice president or chief executive officer any law, regulation, policy or part of this Code that you believe has been broken. Not reporting such information may lead to disciplinary action, including termination.

The Code is designed to provide general guidance and direction regarding ethical and legal business practices and behavior. It is a “living document” that will be updated periodically to respond to changing conditions. Thus, Baptist Health reserves the right at any time to modify the details of this Code within our philosophy of adhering to the highest ethical standards.

CODE OF ETHICS

Compliance with Laws and Regulations

Baptist Health will fully comply with all applicable federal and state laws, regulations, standards and other compliance requirements at all levels of government and within the various health professions employed by the system. We will not pursue any business opportunity that requires unethical or illegal activity.

If you are unsure of the legality of any action or proposed action, you should seek advice from your supervisor or the Legal Department before taking action. If you believe that a violation of a law, regulation, policy or this Code has occurred, report it promptly to your supervisor. If you feel uncomfortable speaking directly to your supervisor or any of the contacts listed throughout this brochure, you may contact the Baptist Health Compliance Hotline at 888-492-9329.

You may also make a report online at *MyComplianceReport.com* (enter Access ID BHS).

Improper Payments

Baptist Health representatives will not solicit, accept, offer or pay bribes, kickbacks or other illegal incentives for the purpose of personal gain, developing business for Baptist Health or for any other purpose.

Gifts

Except in limited circumstances, the giving or receiving of gifts, other than gifts of nominal value, to or from any person or company doing business with Baptist Health, is prohibited. This prohibition extends to family members as well. Non-cash gifts of nominal value may be accepted. Common sense should be applied to determine if the gift has more than nominal value. Generally, a one-time gift of a value of less than \$150, with an annual aggregate value not to exceed \$300, will be considered nominal.

Gifts can be in the form of favors, gratuities or other things of value. Discounts for personal items from persons transacting business with the system may be gifts and should not be accepted if they are outside of a pre-negotiated Baptist Health discount or are of more than nominal value. Offers of cash or cash equivalents (e.g., gift certificates, gift checks or other negotiable documents) may not be accepted.

Entertainment

Attending business lunches or meals on an infrequent basis, as a guest, with a vendor, sales representative or other person transacting or potentially transacting business with Baptist Health, is permissible as long as the frequency of such meals is not excessive and the meals are of nominal value.

Any question concerning gifts or entertainment should be resolved through discussion with appropriate supervisory personnel, your Human Resources representative or the Audit and Compliance Department. In some circumstances, consideration may have to be given to other factors, such as appearances, rather than solely monetary value.

Vendor-sponsored Travel

On occasion, a vendor or potential vendor will offer to pay for an employee of Baptist Health, or a member of his or her immediate family, to attend an educational program, seminar, user group, speaking engagement, promotional program, meeting, site visit or other activity. In order to avoid the appearance of impropriety, and to ensure that all decisions regarding vendor and product selection are in the best interests of the organization, Baptist Health does not permit vendor-sponsored travel. If the travel has a

legitimate business purpose, and is in accordance with our policy on travel expenses, Baptist Health will pay for employees' travel.

An employee may accept an invitation from a vendor to attend a social event, meal or other entertainment while traveling, as long as it is nominal and meets the guidelines outlined above.

Honorariums

Members of Baptist Health's management staff may not accept honorariums for speaking engagements. Non-management staff may accept honorariums under limited circumstances, including pre-authorization from the employee's manager.

An individual or organization offering an honorarium may make a contribution to the Foundation in the amount of the honorarium.

Marketing and Public Relations

Baptist Health's marketing and public relations information is truthful and is not intended to mislead. Claims about Baptist Health services are based on facts.

Charitable Contributions

All charitable contributions received from vendors must directly benefit a Baptist Health entity or the Foundation and be paid directly to the Foundation. Under no circumstances may a check be made payable to an individual within Baptist Health. Baptist Health shall not accept any donations that are in conjunction with a marketing effort or sales promotion. Solicitation of vendors for charitable contributions may be made only by the Foundation. Individual employees or departments may not solicit vendors for gifts or contributions. All offers of charitable contributions should be referred to the appropriate Foundation representative.

Incentives for Patient Referrals or Business Transactions

Employees are prohibited from knowingly and willfully soliciting or receiving, or offering or paying anything of value (including a kickback, bribe or rebate), directly or indirectly, in cash or in kind, in return for, or to induce:

- Referring a patient to a Baptist Health facility to furnish, or arrange to furnish, any item or service; or
- Purchasing, leasing, ordering or arranging,

or recommending the purchasing, leasing, ordering or arranging, of any goods, facility, service or item.

Baptist Health will not pay employees, physicians, other healthcare professionals or anyone else for referrals of patients. Bribes, kickbacks or any kind of benefits intended to induce patient referrals are strictly prohibited.

Employees are expected to conduct business with all parties, including fellow employees, healthcare professionals, vendors and payers in accordance with high moral and ethical standards. **All decisions regarding patient care will be based solely on the best interests of the patient.**

Employees and agents involved in the negotiation of contracts for Baptist Health will ensure that all statements, communications and representations are open, accurate, appropriate and truthful and comply with applicable laws and regulations.

The Code requires that employees report any practice or condition that may violate any applicable law, rule, regulation, policy or this Code to appropriate levels of management, the Legal Department and/or the Audit and Compliance Department.

Regulatory and legal restrictions in the area of referral incentives are complex. Because of this, no transactions involving referral sources (e.g., physicians) are to be undertaken without the involvement of the Legal Department.

Contracts or Arrangements with Physicians

All arrangements with clinicians, physicians and other referral sources must be in writing and must identify the specific service that they are paid to provide, as well as specific and realistic time commitments, and include a compensation rate for the services that is at fair market value. The compensation rate cannot be based on the volume or value of any business referred to Baptist Health. All decisions regarding patient care should be made based on what is best for the patient, not on the value of a business arrangement.

All payments or other benefits provided to physicians must be supported with documentation adequate to justify the legal business purpose for which the payment is being made. Documentation in our files must also confirm that the services contracted for were, in fact, provided.

The Anti-kickback Statute prohibits payments or other consideration given to physicians for

referrals for services. When dealing with a physician, no employee will offer or give anything to the physician or take anything from the physician, in exchange for the referral of patients or patient-related services to or from the physician. In addition, the Internal Revenue Service prohibits any private individuals, including physicians, from receiving an undue private benefit as the result of their relationship with a tax-exempt healthcare organization. An undue private benefit could be any amount in excess of the fair market value related to the arrangement.

All contracts with physicians must be approved by the Legal Department or a lawyer specifically designated for this purpose by the Legal Department before finalizing the contract with the physician, to ensure that any contractual arrangements do not violate the Anti-kickback Statute, Stark Laws, IRS regulations or any other law or internal policy.

Physician Referral Prohibitions

Baptist Health will not knowingly submit a bill or charge for certain services in which the referring physician (or an immediate family member) has a financial relationship with the system, unless certain exceptions are met.

Because of the complexity of these laws, approval from the Legal Department, or a lawyer specifically designated for this purpose by the Legal Department, must be obtained prior to establishing a financial relationship with any physician.

Competitive Practices

Baptist Health strives to have good relationships with other healthcare providers and complies with all applicable laws pertaining to antitrust and competition. Such laws generally forbid any kind of understanding or agreement, whether written or oral, between competitors to fix or control fees for services, terms or conditions of treatment, or to engage in any other conduct that restrains competition.

Employees will refrain from discussing proprietary or confidential information, such as pricing policy, terms and conditions, costs, inventories, marketing and product plans, market surveys and studies, production plans and capabilities with anyone outside of the system.

Baptist Health will compete fairly in the market. We will not agree with a competitor about what prices to charge, whom to call on for sales and what services to offer.

The following are examples of prohibited activities:

- Attempts to unlawfully monopolize the provision of medical services;
- Predatory fees (fees set at unreasonably low levels to drive out or keep competitors out of the market);
- Telling a supplier that Baptist Health's decision to purchase goods or services is dependent upon the supplier's seeking medical services from Baptist Health;
- Other tying arrangements (conditioning the purchase or sale of one product on an agreement to do other business with Baptist Health);
- Paying an unaffiliated healthcare provider cash or giving gifts as an incentive to promote Baptist Health's services.

Quality of Care

Baptist Health is committed to providing consistently high-quality patient care services without regard to race, color, religion, sex, sexual preference, national origin or disability. To avoid compromising the quality of care, clinical decisions (including tests, treatments and other interventions) are based on identified patient healthcare needs, not on financial circumstances. It is our goal to provide high-quality healthcare services to our patients with skill, concern and compassion.

Medical Records Coding and Billing of Third Parties

The intentional submission of any claims for payment or reimbursement of any kind that are false, fraudulent, inaccurate, incomplete or fictitious will not be tolerated.

There are strict federal and state laws and regulations governing third-party billing of our insured patients. Baptist Health and its employees can be prosecuted for intentionally filing inaccurate claims for reimbursement, which carries extremely large civil fines or criminal penalties or both.

Baptist Health's Code of Ethics requires:

- Employees who perform billing and coding to take every reasonable precaution to

ensure that their work is accurate, timely and in compliance with the applicable system policies and federal and state laws and regulations;

- Baptist Health to correct the bill as appropriate if inaccuracies are discovered in bills that have been submitted;

- Baptist Health to bill only for services actually rendered and that are appropriately documented in patients' medical records, using only billing codes that accurately describe the services provided; and

- Baptist Health to ensure that all claims to Medicare, Medicaid and other federal and state programs are for services that are medically necessary (to the extent reasonably possible) and properly documented.

The following are examples of unacceptable billing practices:

- Knowingly and willfully making, or causing to be made, any false statement or representation of material fact in any bill, claim or report submitted to a third-party payer;

- Concealing or failing to disclose an event affecting the right to or amount of a payment, with the intent to fraudulently secure payment in an amount greater than is due or when no such payment is authorized;

- Presenting, or causing to be presented, a false or fraudulent claim; and

- Submitting requests for payment in violation of the terms of an assignment or an agreement with the payer.

Employees are obligated to notify appropriate supervisory or management staff or the Audit and Compliance Department of any requests to deviate from accepted billing practices or with any questions they may have in this area.

False Claims Act

The Federal Government enacted the False Claims Act (FCA) to prohibit the knowing submission of false or fraudulent claims to the federal government, including Medicare. Penalties for violating the FCA can be up to three times the amount of the payment received on the claim, plus additional amounts up to \$11,000 per false claim. False claims can also result in exclusion from the Medicare and/or Medicaid programs. The state of Florida has enacted a similar law, which also includes

penalties for individuals or entities who submit false or fraudulent claims to the state or to Medicaid.

In order to prevent violations of the federal and Florida FCAs, Baptist Health has established policies and procedures that reinforce our commitment to the highest ethical standards when it comes to submitting claims for payment to any payer. These policies and procedures are available on the intranet and are summarized in our Code of Ethics. Consistent with the FCA, we encourage employees, vendors and contractors to report to us suspected improper conduct. We protect from retaliation any employee, vendor or contractor who reports to Baptist Health a suspected violation. Potential violations may be reported directly to any member of management or anonymously via the Compliance Hotline or online at *MyComplianceReport.com* (enter Access ID BHS).

The Audit and Compliance Department is the department primarily responsible for investigating allegations of misconduct. The department charter sets out the mission for the department and describes its responsibility to assist in the prevention and detection of fraud, waste and abuse. The department performs proactive audits, provides training and performs investigation, all under the guidance of the Audit and Compliance Committee of the Board of Trustees. The policies and procedures addressing Baptist Health's commitment to, and the department's role in, the prevention and detection of fraud, waste and abuse are available on the intranet.

Record-keeping

All Baptist Health records (financial, clinical and employee) will be accurate, timely, reliable and properly stored. All assets, liabilities, revenue and expenses must be recorded in the books of the health system. All transactions must be appropriately documented and all assets used for the purpose approved.

The Code emphasizes the need for honesty, integrity and accuracy in our conduct and in all of our transactions. The accuracy and thoroughness of Baptist Health's records are an essential element of sustaining high ethical, professional and legal business practices.

Fair and Equitable Treatment of Employees

Baptist Health will ensure that employees are afforded nondiscriminatory terms, conditions and privileges of employment in accordance with the law, regardless of race, color, religion, national origin, sex, sexual preference, age, disability or any other factor protected by applicable law.

Baptist Health's supervisors and managers are available to discuss and resolve any concerns employees may have as to any aspect of their employment and responsibilities, including issues involving fair and equitable treatment. Human Resources representatives may be contacted to assist in resolving issues such as these.

Because of the high premium we put on the value of employees, Baptist Health has adopted a comprehensive values statement that clearly articulates our Human Resources philosophy.

Time Sheet Reporting

Employees who submit time reports must be careful to do so in a complete, accurate and timely manner. Employees must be particularly careful to ensure that hours worked and costs incurred are applied to the expense account for which the effort was required.

The employee's signature (manual or electronic) on a time report is a representation that the time report accurately reflects the number of hours worked. The supervisor's signature on a time report or expense report is a representation that it has been reviewed and that steps have been taken to verify the validity of the hours or expenses reported and the correctness of the allocation of the hours or expenses. Supervisors will avoid placing pressure on subordinates that could lead them to believe that deviations from appropriate time reporting or cost-charging practices will be tolerated.

Conflicts of Interest

A potential conflict of interest exists when you have the opportunity to benefit personally, beyond the receipt of your paycheck, from an action you are taking as part of your job duties. Potential conflicts of interest come in many forms. For example, let's assume you are responsible for ordering medical supplies and can order those supplies from any one of three suppliers. If your husband or wife sells medical supplies for one of those suppliers and is paid on commission,

you have a potential conflict of interest because you may benefit personally by ordering the medical supplies from that supplier. That does not necessarily mean that you may not order medical supplies from that supplier. It means that you must complete a conflict of interest disclosure form (in accordance with the employee conflict of interest policy) and forward it to the Audit and Compliance Department and your manager. A decision will then be made on whether you may order from that supplier.

In order to avoid conflicts of interest, you are expected to:

- Serve Baptist Health with undivided loyalty and never use your position for personal gain;
- Devote your full time and ability to Baptist Health's interests during your regular working hours and for whatever additional time may be properly required;
- Refrain from accepting additional employment or engaging in business activities outside regular working hours if these would tend to impair your ability to meet your regular job responsibilities to the system or may conflict or compete with services provided by Baptist Health; and
- Submit a written disclosure form to the Audit and Compliance Department and your manager of any actual or potential conflicts of interest as they occur.

Maintaining the Confidentiality of Patient Information and Records

Our profession requires that we gather a great deal of personal and health information about patients. Therefore, we must carefully avoid any unwarranted invasion of the patient's right to privacy. The inappropriate release of patient information in any form may be injurious to the patient and to Baptist Health. This includes health or contact information about a patient or even just the patient's name. The inappropriate release of patient information may subject you to civil and criminal prosecution, as well as termination from Baptist Health.

In order to protect patient information from inappropriate disclosure, you are expected to:

- Limit your access to, and use of, patient information to that required by your duties, permitted by law and authorized by Baptist Health;

- Use only legitimate and authorized means to collect patient information and, whenever practical, obtain it directly from the patient;
- Release information concerning patients in drug and alcohol treatment programs and information regarding a patient's HIV status only in accordance with special confidentiality rules and laws that apply to this information;
- Refrain from revealing any patient information unless supported by legitimate business or patient care purposes as defined by Baptist Health;
- Not discuss health information about a patient with any person inside or outside Baptist Health unless it is in connection with your work, permitted by law and authorized by Baptist Health;
- Be aware of your surroundings and guard against visitors and third parties needlessly overhearing patient health information; and
- Refrain from removing, sending or electronically transmitting a patient medical record, or copy of such a record, from a designated storage facility or department without the authorization of a supervisor or other designated official.

Maintaining the Confidentiality of Business Information and Records

All business records of Baptist Health are proprietary and confidential, and certain records must be maintained in compliance with the law. Federal and state laws also require that Baptist Health maintain certain business records for minimum periods of time. In addition, Baptist Health often has a need to locate various business and corporate records on short notice. Therefore, you will limit your access, use and disclosure of business information and corporate records to that required to perform your duties as an employee of Baptist Health. You will not remove or electronically transmit business or corporate records, or copies of such records, from any department of the system without authorization of the appropriate manager.

Political Contributions

Employees may not contribute or donate funds, products, services or other resources of any tax-exempt system entities to any political cause, party or candidate. However, employees may

voluntarily make personal contributions to any lawful political cause, party or candidate, as long as the individual does not represent that such contributions come from Baptist Health and as long as the individual does not obtain the money for those contributions from Baptist Health for the sole purpose of making such a contribution.

Relationship with the Government

All requests for information from any regulatory agency should be complied with in an accurate and timely manner and in conformance with applicable laws and regulations governing such requests for reports or information.

All notifications of a violation or citation alleging a violation relating to a matter addressed in this Code from a governmental regulatory agency or its representative will be referred to the Legal Department or the Audit and Compliance Department for immediate attention.

It is management's intent to always fully and completely cooperate with all valid and appropriate government inquiries or investigations concerning the legal or business practices of Baptist Health.

Employees should not obstruct any government request for information, audit or investigation performed of Baptist Health. You must contact the Legal Department immediately upon receipt of any non-routine request (subpoena, affidavit, warrant, etc.) from any government agency or its representative.

Baptist Health employees must fully cooperate with all internal and external audits conducted, including Audit and Compliance Department audits and investigations.

Credentials

Only appropriately licensed and credentialed individuals may provide medical care at Baptist Health facilities. Baptist Health will not hire or contract with persons or entities that have been excluded from participation in federal or state healthcare programs.

Safeguarding and Proper Use of Assets

Employees are personally responsible and accountable for the proper use of Baptist Health funds and property. Each employee is responsible for taking measures to protect computer systems and networks from unauthorized use,

access or modification of software. Baptist Health also requires employees to protect patient and other customer property and information to the extent possible.

Baptist Health employees are expected to:

- Be personally responsible and accountable for the proper expenditure of Baptist Health's funds and the proper use of system property;
- Use supplies, equipment and property bought and owned by Baptist Health for business purposes only. Unauthorized use of Baptist Health property is considered theft;
- Use computer systems' software and hardware that Baptist Health owns or operates to conduct business and follow the requirements of software copyright licenses and corporate policies on software usage. Use of a Baptist Health computer does not guarantee personal privacy; and
- Dispose of surplus, obsolete or junked property in accordance with Baptist Health policies and procedures. Unauthorized disposal of property is a misuse of assets.

Any improper financial gain to an employee through misconduct involving the property of Baptist Health, or its patients or customers, including the outright theft of property, embezzlement of money, or the use of money belonging to Baptist Health, its patients or customers for anything other than an authorized purpose, is a serious violation and may lead to prosecution and/or disciplinary action, up to and including termination.

Community Benefit and Charity Care

We provide respectful treatment and care to all patients coming to our facilities in an emergency, regardless of ability to pay or the source of payment. Baptist Health recognizes its responsibility as a provider of healthcare services to all citizens of our community and will provide charity care to those meeting established criteria.

COMMUNICATING LEGAL AND ETHICAL ISSUES

Baptist Health encourages you to discuss legal and ethical issues that arise while performing your job. Baptist Health does not permit retaliation and will protect those coming forth in good faith to relate such issues. Baptist Health does not tolerate retaliation or retribution against any employee who, in good faith, reports a legal or ethical concern.

Whose Responsibility?

Baptist Health's Code of Ethics is designed to promote honesty and fairness to everyone with whom you interact. It is your responsibility to ensure that all your associations with patients and the community are honest, and that you are familiar with and adhere to this Code and all Baptist Health standards and procedures.

Baptist Health's reputation depends upon you doing your part to report any questionable ethical actions or violations you suspect. Our anti-fraud initiatives are designed to identify potential occurrences of unethical activities such as theft or fraud. In addition, our employees are expected to report anything that may be illegal or unethical, so it can be remedied and violators can be disciplined.

Supervisors will be accountable for making sure their employees understand this Code. As a supervisor, you must listen to your employees' concerns, take action to resolve their concerns and deal with problems. It requires that you set an ethical example for your employees to follow.

Questions to Ask

Q. What if I'm confronted with a compliance problem and I don't know how to handle it?

- A.** Ask yourself the following questions:
- Does a specific act or policy appear to be in compliance with the relevant laws, regulations and the Baptist Health Code of Ethics?
 - How would the issue appear to your family, friends and the general public?
 - How would you feel explaining this matter to someone else to justify the action taken?
 - Do you feel it would be advisable to seek further clarification from someone at Baptist Health with expertise in the area of compliance?

How to Communicate Issues

Talk to your supervisor about your concerns. Your supervisor is in a good position to listen to you and understand the concerns you have. Give your supervisor an opportunity to resolve the issue. Your supervisor is responsible for taking advantage of resources throughout Baptist Health to assist in upholding the Baptist Health Code of Ethics.

Discuss the issue(s) with the next management level. If you have raised an issue and you do not think it is getting proper attention or if your supervisor cannot find the appropriate answer(s), you may relate your concerns to the next management level.

If your supervisor or next-level manager is unable to resolve the issue(s) satisfactorily, or you are not comfortable talking to these individuals, you may contact the following until the issue is resolved to your satisfaction: Human Resources, the Legal Department, the Audit and Compliance Department and/or any vice president or chief executive officer.

Other Baptist Health Resources

Baptist Health has created a Compliance Program, and other resources are available throughout Baptist Health to answer questions and guide you on various matters.

When you have questions relating to legal matters, billing, potential conflicts of interest or any legal or ethical issue, the following contacts at Baptist Health are available:

Audit and Compliance Department	786-662-7352
Legal Department	786-662-7022
Human Resources	
Baptist Hospital	786-596-4467
Baptist Outpatient Services	786-596-8373
Corporate Offices	786-662-7458
South Miami Hospital	786-662-8888
Doctors Hospital	786-308-3205
Homestead Hospital	786-243-8552
Mariners Hospital	305-434-1657
Compliance Hotline	888-492-9329
HIPAA Privacy Hotline	786-596-8850

Compliance Liaisons — Located in Risk Management

Baptist Hospital	786-596-6526
Baptist Outpatient Services	786-596-4043
Doctors Hospital	786-308-3181
Homestead Hospital	786-243-8546
Mariners Hospital	305-434-3000
South Miami Hospital	786-662-5018

Using the Compliance Hotline

If you do not feel comfortable discussing your concerns with your supervisor or manager, you may call the Compliance Hotline, toll-free, and we will protect your anonymity to the extent possible. The number is **888-492-9329**.

This line is not intended to replace your normal reporting process, but it is another resource available to you when you have used other routes or do not feel comfortable discussing the issues with your supervisor or manager.

Calls are handled confidentially and the caller is protected from any form of retaliation or retribution for reporting a violation. If anyone attempts to retaliate against an employee who reports an ethical or legal concern, and the report was made in good faith, that person will be subject to disciplinary action, up to and including termination of employment.

In addition, compliance reports can also be made online at *MyComplianceReport.com*. Enter Access ID BHS. Just like calls received via the Hotline, online reports can be made anonymously. Online reports are handled in the same confidential manner as calls, and anyone making an online report in good faith is also protected from retaliation or retribution.

In Closing

Baptist Health's goal is to provide quality, comprehensive, cost-effective and advanced healthcare services that meet the needs of the patients and communities we serve. Baptist Health is committed to providing a high level of ethically and professionally competent services and promoting the best possible state of health for our patients and communities. These services shall be provided within the context of high ethical standards.