

## **SECTION 1 CODE OF BUSINESS CONDUCT (“CODE”)**

### **1) Adherence to the Highest Standards**

- We shall, at all times, conduct ourselves with honesty and integrity in accordance with the highest ethical, legal and professional standards.
- We endeavor to hire the best, most qualified individuals while striving to attract, train and retain a diverse workforce.

### **2) Individual Responsibility & Accountability**

- Each of us is expected to become familiar with the laws and regulations that apply to our positions and duties.
- All questions and concerns about the legality or appropriateness of any action or failure to take action by or on behalf of St. Joseph's Imaging Associates, PLLC should be referred to your direct supervisor, the Compliance Officer, or the Compliance Hotline (315-448-5756).

### **3) Respect for the Rights and Dignity of Others**

- We treat everyone with respect and dignity. Harassment, intimidation, disruptive behaviors or abuse of any kind is prohibited in the St. Joseph's Imaging Associates, PLLC workplace.
- We make no distinction in the availability of services or in the care we provide based on age, gender, disability, race, color, religion, or national origin.
- Personnel should be committed to the ethical and compassionate treatment of patients and compliance with established policies and statements of patient rights.
- We act as positive role models for our trainees, staff and visitors; and show due respect to subordinates and each other.

### **4) Respect for Confidentiality and Privacy (Personal and Confidential Information)**

- Health information, including billing records, is confidential. We use confidential information only to perform our job responsibilities and do not share such information with others unless the individuals or entities have a legitimate need to know the information. We follow applicable laws and policies regarding privacy and information security when accessing, using, disclosing, or creating, storing, receiving and transmitting confidential records. Passwords are not to be shared.
- Personnel records should only be accessible to management, Human Resource Staff, Internal Audit and those responsible for protecting them.

### **5) Strive to Attain the Highest Standards of Patient Care**

- We provide quality health care in a manner that is appropriate, medically necessary, and efficient.
- We place the interests of our patients above our own self-interests.

### **6) Medical Necessity**

- St. Joseph's Imaging Associates, PLLC shall submit claims for payment to governmental, private, or individual payers only for services or items that are medically necessary and appropriate.
- Patients may request a service that is not a covered benefit. The service may be provided as long as the patient has been given advance notice that a service is not a covered benefit and has agreed to pay for the services.

**7) Compliance with all Coding, Billing, Cost Reports and Other Contractual / Grant Terms and Conditions**

- Every member of St. Joseph's Imaging Associates, PLLC is involved, directly or indirectly, in the preparation or submission of a bill to any governmental or private payer is expected to ensure the bill reflects only those services rendered and products delivered and in the correct amount, supported by appropriate documentation.
- St. Joseph's Imaging Associates, PLLC and agents who are responsible for providing services, for documentation, coding, billing, and accounting for patient care services must comply with all applicable state, federal and payer regulations and policies.
- Cost reports will be properly prepared, allocated to the correct cost centers, and supported by verifiable and auditable cost data according to all applicable rules and regulations. Certain individuals with responsibility for preparation of financial statements and disclosures will be required to make attestations in support of Standards of Ethical Conduct.

**8) Avoidance of Conflicts of Interest or Commitment**

- We avoid both actual conflicts of interest and commitment and the appearances of such conflicts and devote professional allegiance to patients.

**9) Maintenance and Preservation of Accurate Records**

- St. Joseph's Imaging Associates, PLLC creates and maintains patient records and documentation that conforms to all applicable legal requirements, professional standards, and policies.
- Personnel will not knowingly create records that contain any false, fraudulent, fictitious, deceptive or misleading information.
- Personnel must not delete any entry from a medical record. Medical records may be amended and material added to ensure the accuracy of a record in accordance with medical center and medical staff policies and procedures. If records are amended, personnel must indicate that the notation is an addition or correction and include the date / time it was amended.
- Personnel must not sign someone else's signature or initials on a record unless they have been authorized and clearly marked that they are signing on behalf of another (e.g., by initialing the signature).

**10) Government Investigations & Government Requests for Information**

- Every member of St. Joseph's Imaging Associates, PLLC is expected to cooperate with appropriately authorized governmental investigations and audits. Personnel have the legal right to consult a supervisor, Compliance Officer, Risk Management or General Counsel before answering questions. You should immediately contact the appropriate personnel if a representative of the government arrives unannounced.
- Ask to see the government representative's identification and business card if the government representative is there in person. Otherwise ask for the person's name and office, address and telephone number, identification number so that the representative can call the government representative's office to confirm his or her authority.
- Consult with a supervisor before providing the investigator with confidential patient, personnel, student or other documents.
- Do not destroy documents. Do not lie or make misleading statements.
- Do not attempt to persuade any other company employee, or any other person, to provide false or misleading information to a government investigator or fail to cooperate with a government investigation.

## **Section 2. Reporting Violations & Non-Retaliation Policy**

Any suspected violations of the Code or Standards of Ethical Conduct should be reported to a direct supervisor, the Compliance Officer, or the Human Resources Department.

**How to Report:** You may make a report anonymously (by phone, mail or hotline). St. Joseph's Imaging Associates, PLLC, will make every reasonable effort to keep confidential the identity of anyone reporting a suspected violation, except if doing so would effectively prevent them from conducting a full and fair investigation of the allegations.

**Non-Retaliation:** St. Joseph's Imaging Associates, PLLC is prohibited from retaliating against an employee or applicant for employment who has made a good faith report or refused to obey an illegal order, even if the allegation ultimately proves to be without merit. St. Joseph's Imaging Associates, PLLC will, however, pursue disciplinary action against any member who is shown to have knowingly filed a false report.

**Code of Business Conduct will be Enforced:** All members of St. Joseph's Imaging Associates, PLLC are expected to report all known or suspected code of conduct violations. Managers and persons in supervisory roles are required to report allegations presented to them and to report suspected violations that come to their attention in the ordinary course of performing their supervisory duties. Reports of suspected violations will be investigated by authorized personnel. Everyone is expected to cooperate fully with any investigation undertaken. If it is determined that a violation has occurred, St. Joseph's Imaging Associates, PLLC has the right to take corrective or disciplinary action against any person who was involved in the violation or who allowed it to occur or persist due to their failure to exercise reasonable diligence. St. Joseph's Imaging Associates, PLLC may make an appropriate disclosure to governmental agencies, including law enforcement authorities. Disciplinary actions will be determined on a case-by-case basis and in accordance with the applicable policies and procedures.

St. Joseph's Imaging Associates, PLLC the right, at any time, to amend this Code of Business Conduct.

### **ST. JOSEPH'S IMAGING ASSOCIATES, PLLC "CODE OF BUSINESS CONDUCT" COMPLIANCE IS EVERYONE'S RESPONSIBILITY**

Integrity – both personal and professional – is the cornerstone of the healthcare professions. At St. Joseph's Imaging Associates, PLLC, each of us reflects the highest standards of integrity.

Refer to the list of key contacts below to report questions or concerns about issues related to the "Standards of Ethical Conduct" and/or the "Code of Business Conduct".

#### **LIST OF CONTACTS FOR REPORTING CONCERNS**

*Reports may be made in person, by telephone, or in writing to any of the following:*

Lauren Bellotti  
Chief Compliance / Privacy Officer  
St Joseph's Imaging Associates, PLLC  
315-452-2555

Patricia Guiles  
Human Resources  
St Joseph's Imaging Associates, PLLC  
315-703-5117