

Dear Madonna colleague,

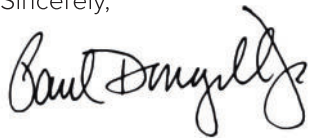
Madonna Rehabilitation Hospitals is committed to delivering quality services to our patients. We do this with our vision, mission and values clearly in mind. Our reputation is one of excellence and integrity.

We have always looked to professional standards of conduct to guide our work. However, as the federal government looks stringently at health care organizations' level of compliance with all the regulations and as Madonna's business has become more complex, it is important for us to clearly state the standards of conduct expected of all employees.

This handout provides information about these expectations. It also informs you of what actions to take if you are concerned about a practice being carried out at Madonna that may not be in compliance with any of the laws and regulations we are required to follow.

It is important that we all work together to assure that all of our processes are well documented and followed closely so you may carry out your job responsibilities in a manner that is ethical and in compliance with the legal requirements under which Madonna operates.

Sincerely,



Paul Dongilli Jr., Ph.D.,  
President and CEO

Madonna will follow the Ethical and Religious Directives for Catholic Health Care Services. We are committed to adherence with applicable laws and regulations and assuring that our actions consistently reflect our values and beliefs.

Standards of Conduct cover broad categories and cannot address every situation but serve as a basis for the culture that will exist at Madonna. Up-to-date organizational policies and procedures are available for assistance in correctly carrying out the services of Madonna.

#### **Admission and Discharge Practices**

Admission and discharge guidelines exist for all programs and services within Madonna and will be followed.

#### **Billing**

Employees will accurately code and bill. They will assure that all billings reflect truth and accuracy, conforming with federal and state laws and regulations.

#### **Certification of Accreditation Review Bodies**

Madonna will provide authorized reviewing bodies with complete, factual and accurate information.

#### **Clinical Services**

All colleagues, medical staff members, contract service providers and other practitioners must be knowledgeable of and in compliance with laws and regulations and should immediately report suspected violations.

#### **Confidentiality of Medical Information**

No employee shall reveal confidential patient information to unauthorized persons.

#### **Conflict of interest**

Employees are to avoid outside activities or interests which could influence or appear to influence their ability to make objective decisions in the course of their job responsibilities.

#### **Discrimination**

Madonna will eliminate and prohibit discrimination and harassment.

#### **Marketing**

Madonna will present truthful and complete information in all marketing and advertising.

#### **Medical Ethics**

Madonna maintains an active Medical Ethics Committee to assist patients, families and staff in dealing with end-of-life and other relevant issues.

#### **Personal Obligation to Report**

Each person has an individual responsibility for reporting any activity by any colleague, physician, subcontractor or vendor that appears to violate applicable laws, rules, regulations or this Code. Federal and State whistleblower laws provide protection to any employee who reports suspected fraud or abuse under The False Claims Act.

#### **Provision of Care**

Services are to be medically necessary and appropriately documented.

#### **Purchase of Services/Materials**

Madonna will employ the highest ethical standards in source selection, negotiation, determination of contract awards and the administration of all purchasing activities.

#### **Scope of Practice**

All licensed employees will know and practice within their respective Scope of Practice Acts. Licenses will be maintained as required.

#### **Referrals**

Madonna accepts patients based solely on the patient's clinical needs and our ability to provide the needed services. Madonna does not pay for referrals into our programs and will not accept payment for referrals we make.

## Reporting a Concern

Please question any process that you think may raise an ethical or legal concern. Upon discovering a concern, please:

- Complete the “Compliance Concern Reporting Form” (Form CC01) in order to give a clear understanding of the concern.
- Share this concern with your supervisor or manager. If you don’t feel comfortable doing this or are not comfortable with the response you received, please contact the corporate compliance officer, or any member of the Corporate Compliance Committee.
- If you wish to remain anonymous, please call the Corporate Compliance Hotline at 402.413.4891 and report the concern using the format outlined on Form CC01 to ensure adequate detail is relayed to properly investigate the concern. The Corporate Compliance Officer periodically checks for messages.

Should you have any questions regarding these Standards of Conduct or Madonna’s Corporate Compliance Plan, please contact the Corporate Compliance Officer.

For a copy of Madonna’s complete Corporate Compliance Program, please contact Risk Management at 402.413.4891.



## Standards of Conduct

