



Premier Health  
Care Services, Inc.

# Code of Conduct

## Provider Services & ED Management



Emergency Medicine  
Services

Hospitalist Services



Occupational Medicine  
Services

# Corporate Compliance



# Premier Health Care Services, Inc.

332 Congress Park Drive • Dayton, OH 45459 • 800-726-3627 • fax 937-312-3654 • [www.premierhcs.net](http://www.premierhcs.net)

Dear Premier Health Care Services Colleague,

Premier Health Care Services, Inc. and its associated divisions are committed to providing quality care to our patients, superior service to our customers, and promoting high ethical standards in the way we conduct our day-to-day activities. As part of this endeavor, we must continually demonstrate that we act with absolute integrity, both in how we associate with our patients, colleagues, and customers and how we interact with each other.

This Code of Conduct is intended to provide guidance ensuring that our daily responsibilities are executed in an ethical and legal manner. Within this Code of Conduct, shared common values and moral principles that guide our actions are emphasized. This Code is the “backbone” of our Compliance Program. Please review it thoroughly. Your adherence to its intent and specific provisions is absolutely critical to our future success.

If you have questions or encounter any situation that you believe violates this Code of Conduct or our Compliance Program, you should immediately consult your supervisor or medical director. If you feel uncomfortable consulting your supervisor, please consult another member of management at your facility or corporate office. In your daily lives and work, if you encounter a situation or are considering a course of action that may be technically within the guidelines of the Code of Conduct, but you are worried that the contemplated action simply “does not feel right,” please discuss the situation with any of the resources listed above. This can include the Compliance Officer for your organization. If you cannot resolve the situation through the above resources, you may also call our confidential Compliance Hotline at 877-631-5718. You have our assurance there will be no retribution for asking questions or raising concerns regarding this Code or for reporting possible improper compliance related conduct or practices.

We are committed to those ideals reflected in our Missions and Values Statement and in our Code of Conduct. We are equally committed to ensuring that our actions consistently reflect our words. In this spirit, we want our organization to be a family of men and women of shared values, and we expect our actions to reflect the high standards set forth in this document.

No Code of Conduct can substitute for your own internal sense of fairness, honesty, and integrity. We trust you as a valuable member of our health care team. We ask you to assist us in supporting these stated values and principles that are critical to achieving our mission and success.

Sincerely,

Premier Health Care Services, Inc.  
Board of Directors

MBI Solutions, Inc.  
Board of Directors

# Mission & Values Statement

It is our mission at Premier Health Care Services, Inc. to provide and ensure quality health care to hospitals, emergency departments, clinics, and offices. We are committed to conducting ourselves as good corporate citizens with professional integrity and honesty. Premier Health Care Services, Inc. will associate itself with hospitals, health care providers, subcontractors, and organizations that share our goal of exemplary health care for our patients and communities. We will serve patients and their families, fellow physicians, pre-hospital providers, and the community in a spirit of excellence.



**In pursuit of our mission, we believe the following value statements are essential and timeless:**

- Integrity** We act with honesty in all aspects of our business
- Excellence** We strive to be the best in all we do
- Compassion** We treat everyone with dignity, respect, and kindness
- Innovation** We seek new and better ways to conduct our business
- Teamwork** We promote collaboration and open communication to achieve organizational goals
- Diversity** We recognize and affirm the unique and intrinsic worth of each individual

# Purpose of the Code of Conduct

This Code of Conduct will serve as a guide to promote a uniform culture of compliance to all providers and colleagues of Premier Health Care Services, Inc. and its subsidiary entities. In addition, this Code of Conduct

has been developed to provide a framework to ensure that we conform with applicable federal and state laws and regulations. All members of our organization are obligated to follow this Code of Conduct.

## Compliance Program

Premier Health Care Services, Inc. has implemented a Compliance Program. This Compliance Program is overseen by a multi-disciplinary Compliance Committee, which actively monitors compliance concerns.

All physicians, nonphysician providers and employees are required to attend educational and training sessions related to the Compliance Program. It is also mandatory for all physicians, nonphysician providers, and employees to report actual or possible compliance-related violations. This report may be directed to a supervisor, to the company's Compliance Officer, or the Premier Health Care Services' Compliance Hotline.

No one shall be subject to retaliation by any person affiliated with Premier Health Care Services, Inc. or its subsidiaries for reporting actual or



possible violations or for cooperating in an investigation.

All reports will be investigated in a prompt, reasonable, and confidential manner by the Compliance Officer or Compliance Committee.

Premier Health Care Services, Inc. will take appropriate measures against those who violate these standards and policies including failure to report misconduct or compliance concerns.

# Code of Conduct

## Ethical & Quality Service

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Ethical behavior is a key component of our corporation and ultimately to our success. We recognize that as health care providers we set the tone for those that work with us and associate with us. Ethical dilemmas present themselves daily and must be approached with honesty, sincerity and clarity of purpose. Our patients place their lives, trust, and hopes in our hands. We must honor this confidence by continuously demonstrating honor and respect.

Clinical excellence is what distinguishes us from our peers. We actively monitor the quality of our clinicians. All providers are expected to actively participate in the performance improvement process under the direction of their medical director or hospital. When opportunities for improvement are identified, clinicians are to respond in a professional manner. In addition, we expect all of our clinicians to meet or exceed the CME requirements for their specialty and state license.

# Code of Conduct

## Compliance with the Law

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Premier Health Care Services, Inc. acknowledges the need to be proactive in understanding health care law and regulations. Although at times these regulations may seem overwhelming, confusing and complex, they must be adhered to. Ignorance of the law is unacceptable. Pertinent laws and regulations include subjects such as licenses, permits, accreditation, access to treatment, consent to treatment, medical record-keeping, access to medical records, confidentiality, patients' rights, medical staff membership, clinical privileges, corporate practice of medicine restrictions, and Medicare and Medicaid regulations. We expect our employees to actively learn and comply with the laws and regulations pertinent to their job and responsibilities.

Premier Health Care Services, Inc. will be forthright in dealing with any billing inquiries. Requests for information will be answered with complete, factual, and accurate information with consultation and review by the Compliance Committee, if necessary. We will cooperate with and be courteous to all government inspectors and provide them with the information to which they are entitled during an inspection per our corporate policy. During a government inspection, you must never conceal, destroy, or alter any documents. In addition, you must not lie or make misleading statements to any government representative. You should not attempt to cause another employee or associate to fail to provide accurate information or obstruct, mislead, or delay the communication of information or records relating to a possible violation of law.

# Code of Conduct

## Respect & Fairness

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We have been blessed with a wide complement of talents which contribute greatly to our success. How we treat each other, the language we use, and the respect we give to one another define us as a corporation. We must interact with each other in a manner that honors each others' individuality and professionalism. All employees have the right to work in an environment free of harassment. Degrading or humiliating jokes, slurs, intimidation, or other harassing conduct is not acceptable in our workplace. Any form of sexual harassment is strictly prohibited. This prohibition includes unwelcome sexual advances or requests for sexual favors in conjunction with employment decisions. Moreover, verbal or physical conduct of a sexual nature that interferes with an individual's work performance or creates an intimidating, hostile, or offensive work environment has no place at Premier Health Care Services, Inc. or any of its locations.

As part of our commitment to a safe workplace for our employees, we prohibit possession of unauthorized firearms, explosive devices, or other dangerous weapons or materials on Premier Health Care Services, Inc. premises or while on duty off Premier premises. Employees who observe or experience any form of harassment or violence should report the incident to their supervisor, a member of management, the Compliance Officer or to the Compliance Hotline.

We are committed to providing an equal opportunity work environment where everyone is treated with fairness, dignity, and respect. We will comply with all laws, regulations, and policies related to non-discrimination in all of our personnel actions. Such actions include hiring, staff reductions, transfers, terminations, evaluations, recruiting, compensation, corrective action, discipline, and promotions. No one shall discriminate against any individual with a disability with respect to any offer, term, or condition of employment. We will, as required by law, make reasonable accommodations to the known physical and mental limitations of otherwise qualified individuals with disabilities.

# Code of Conduct

## Conflict of Interest

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A conflict of interest may occur if your outside activities or personal interests influence or appear to influence your ability to make objective decisions in the course of your job responsibilities. A conflict of interest may also exist if the demands of any outside activities hinder or distract you from the performance of your job or cause you to use employer resources for other than employment purposes. It is your obligation to ensure that you remain free of conflicts of interest in the performance of your responsibilities. If a conflict of interest exists or is likely to exist, or you have any questions about whether an outside activity might constitute a conflict of interest, you must obtain the approval of your supervisor before pursuing the activity in question.

# Code of Conduct

## Confidentiality

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We understand that our medical information is highly confidential and will take all reasonable precautions to ensure that private health care information is not disclosed in violation of the rights and personal privacy of a patient. Physicians, nonphysician providers, and employees will have access to medical records only as necessary to perform his or her job. Employees found accessing medical records outside of their job function will be disciplined in an appropriate manner according to our employee manual. In addition, Premier Health Care Services, Inc. and its subsidiaries will adhere to the privacy guidelines set forth in HIPAA.

Confidential information about our organization's strategies and operations is a valuable asset. Although you may use confidential information to perform your job, it must not be shared with others unless they have a legitimate need to know this information and have agreed to maintain the confidentiality of the information. Confidential information includes personnel data maintained by the organization, patient lists and clinical information, pricing and cost data, information pertaining to acquisitions, divestitures, affiliations and mergers, financial data, research data, strategic plans, marketing strategies, techniques, colleague lists, data maintained by the organization, suppliers and subcontractors, coding and billing policies (i.e., coding bible), and proprietary computer software.

# Code of Conduct

## Safety & Security

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We are committed to an alcohol and drug-free work environment. All employees must report for work free of the influence of alcohol and illegal drugs. Reporting to work under the influence of any illegal drug or alcohol, having an illegal drug in your system, or using, possessing, or selling illegal drugs while on work time or property may result in immediate termination. We may use drug testing as a means of enforcing this policy. It is also recognized that individuals may be taking prescription drugs, which could impair judgment or other skills required in job performance. If you have questions about the effect of such medication on your performance, consult with your supervisor or medical director.

# Code of Conduct

## Personal Obligation to Report

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We are committed to ethical and legal conduct that is compliant with all relevant laws and regulations and to correcting wrongdoing wherever it may occur in our organization. Each physician, mid-level provider and employee has an individual responsibility for reporting activity by any employee, physician, subcontractor, or vendor who appears to violate applicable laws, rules, regulations, or this Code.

Violations of the Code of Conduct are to be referred to your immediate supervisor or the respective Corporate Compliance Officer. If you feel uncomfortable talking to your supervisor, please notify your medical director, another member of management at your facility, or you can contact the Compliance Officer for your organization. You may also call the Compliance Hotline at 877-631-5718 if you cannot get the situation resolved through the proper channels. The Compliance Officer and supervisors will review the issue and determine if a variance exists.



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**Corporate Compliance Hotline: 877-631-5718**



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