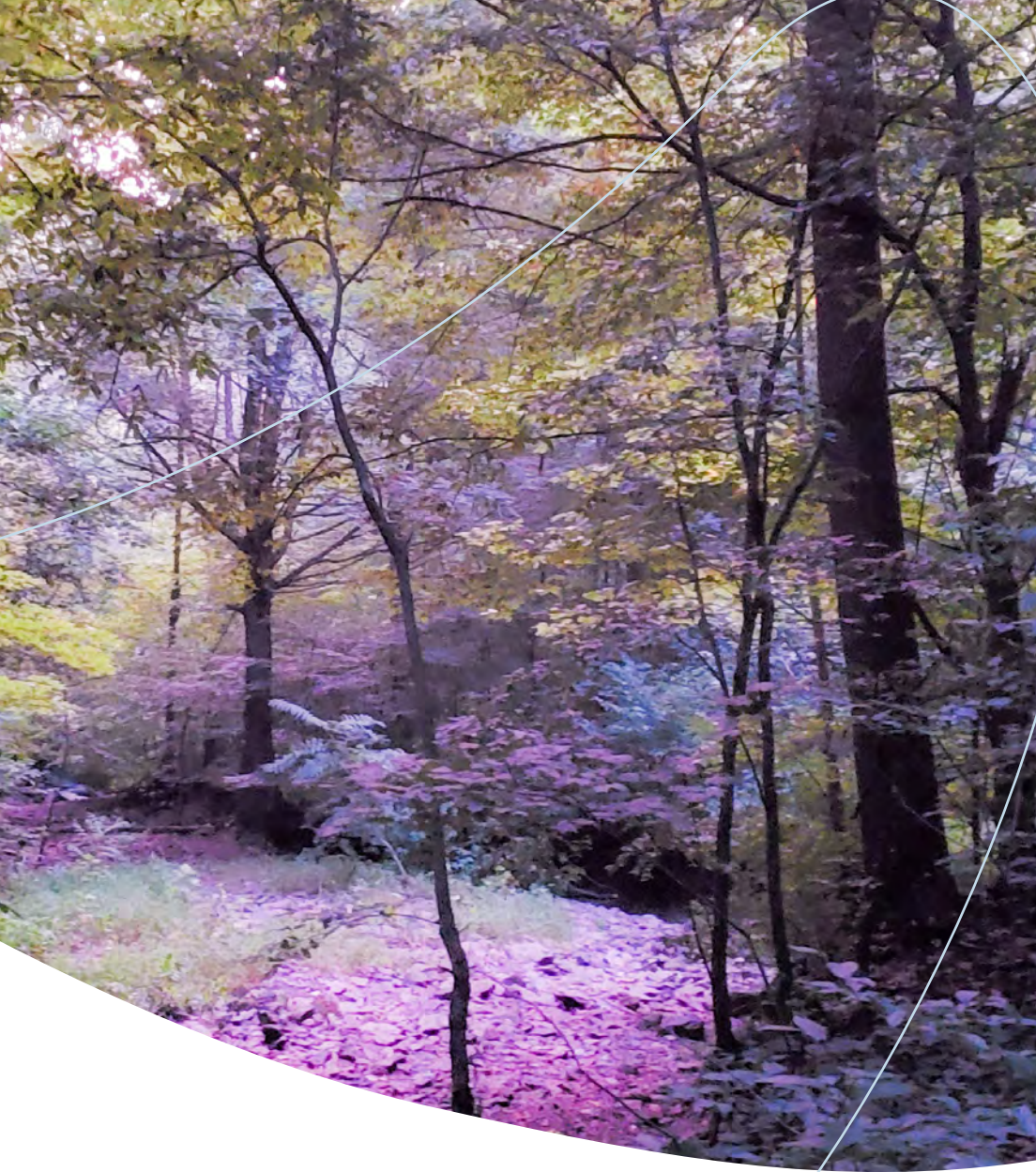




Compliance Program



MESSAGE FROM THE PRESIDENT

Dear Fellow SIH Employee,

Southern Illinois Healthcare is dedicated to achieving high ethical standards and maintaining responsible business practices. In support of our commitment to being a leader in providing safe, quality, compassionate healthcare to our communities, SIH has developed a Corporate Compliance Program. Operating within the Corporate Compliance Program demonstrates our good faith effort to do the right thing.

Health care is a highly regulated and increasingly complex industry and the Corporate Compliance Program has been developed with this in mind. This Program, together with the Code of Ethics, serves as a guide to direct us in our daily activities. Performing our job duties in compliance with the rules, regulations, laws, and internal policies and procedures allows us to provide excellent, quality care in a safe environment.

Compliance is a team effort; the conduct of any individual can impact the organization and our patients. We all must do our part to meet the expectations of those we serve and those who regulate us. As President of SIH and CEO, I will lead by example, abiding by the highest ethical standards. Please join me in taking responsibility for keeping our organization on the right path.



A handwritten signature in dark ink, appearing to read "John Antes". The signature is fluid and cursive, written over a light gray rectangular background.

John Antes
President & CEO
Southern Illinois Healthcare

Introduction

Southern Illinois Healthcare (SIH) is committed to providing quality healthcare and services in compliance with our mission and values. This Corporate Compliance Program is a reaffirmation of SIH's commitment to be a quality organization with high moral and ethical standards. Consistent with these standards, SIH intends to comply with all laws, regulations, accreditation requirements, third party payor agreements, and internal procedures. Southern Illinois Healthcare's Corporate Compliance Program has an emphasis on mitigating fraud and abuse in the Medicare and Medicaid program; however, the program is designed to address all laws and regulations that are applicable to SIH and its operations.

The Board of Trustees is responsible for making the Corporate Compliance Program's objectives consistent with SIH's mission and values and to see that the objectives of the Program are reflected in all governance, risk management, information management, financial, and operational activities. The effectiveness of the Program is monitored by the Board of Trustees through the receipt of reports from the Corporate Compliance Officer and the Corporate Compliance Committee.

The Board of Trustees has the authority and responsibility to make final decisions concerning compliance issues and must approve any change to the Corporate Compliance Program. The Corporate Compliance Officer and the Corporate Compliance Committee may periodically evaluate the effectiveness and suggest revisions of the Corporate Compliance Program to the Board of Trustees, but the Board has final authority to revise, amend, modify, replace, or terminate the Corporate Compliance Program.

The Corporate Compliance Department, under the direction of the Corporate Compliance Officer, performs the day-to-day operations of the Corporate Compliance Program. The mission/vision of the Corporate Compliance Department is to prevent and detect violations of law, regulation, and policy throughout SIH and to run an exemplary compliance program that helps create an atmosphere of excellence and attention to legal and ethical standards. However, the ultimate responsibility for compliance rests with each individual within the organization.

The standards of the Corporate Compliance Program and the Code of Ethics can only be achieved and sustained through the actions and conduct of all members of the SIH workforce, which includes all levels of management, employees, students, and volunteers. While SIH cannot control actions of individuals other than its own workforce, it will monitor and manage third party relationships to minimize associated risks and decline business and other forms of association with businesses or individuals that do not operate in an ethical and compliant manner.

Each member of SIH's workforce has an obligation to familiarize himself or herself with all applicable laws and regulations, and to comply with those laws in performing his or her job responsibilities. Each member of the workforce performs his/her duties in good faith, in a manner that he or she reasonably believes to be in the best interest of SIH and its patients, and with the same care that a reasonably prudent person in the same position would use under similar circumstances.

History

Southern Illinois Healthcare began its efforts to develop the Corporate Compliance Program in the fall of 1996. Since SIH is a values-driven organization, its Mission and Values Statement, approved by the Board of Trustees on January 25, 1996, formed the basis of the Corporate Compliance Program. The Board of Trustees approved a preliminary Corporate Compliance Program on December 11, 1997. Another key component of the Program, SIH's Code of Ethics, was approved by the Board on March 26, 1998. The Code of Ethics outlines expected behaviors of all people and organizations associated with SIH consistent with the mission and values of the organization.

The Board of Trustees approved the first Corporate Compliance Program on January 28, 1999. The Corporate Compliance Program is a living document, subject to modification and changes, to accommodate the continually changing regulatory environment. In order to keep the Corporate Compliance Program current, the Corporate Compliance Officer will review the Program no less often than annually and propose any changes that are necessary to the Board of Trustees.

Program Description

Corporate Compliance Program

The Corporate Compliance Program is an internally developed, self-governing program that promotes ethical and legal business practices. It is designed to prevent, detect, correct and, if necessary, report noncompliant or illegal activities to the appropriate federal and state authorities.

Purpose of the Corporate Compliance Program

This Corporate Compliance Program has been developed to assist in establishing a culture within SIH that promotes the prevention, detection, and resolution of instances of conduct that do not conform to federal and state law; federal, state, and private payor health care program requirements; or SIH's Code of Ethics and internal policies. One of the objectives of the Corporate Compliance Program is to reduce the potential for fraud and abuse by:

- Providing additional oversight of SIH's compliance with laws, regulations, and special conditions imposed upon it by licensing and regulatory authorities;
- Identifying and preventing compliance violations and unethical conduct;
- Identifying and avoiding transactions or business practices which might result in improper payment or reimbursement;
- Minimizing the loss to the government from false claims, thereby reducing the facility's exposure to civil damages and penalties, criminal sanctions, and administrative remedies, such as exclusion from the Medicare and/or Medicaid programs;
- Encouraging employees to report potential compliance violations;
- Improving operations, and
- Supporting SIH's commitment to provide safe, quality patient care.

Laws and topics covered by SIH’s Corporate Compliance Program

SIH’s Corporate Compliance Program has an emphasis on fraud and abuse in the Medicare and Medicaid programs; however, the Program also includes compliance with virtually every law and regulation that applies to SIH. The scope of topics covered by SIH’s Corporate Compliance Program includes, but is not limited to, the following:

Americans with Disabilities Act	Equal employment opportunity	Patient rights and consent
Anti-trust laws	Finance and accounting	Proper collection practices
Certification standards	Fraud and abuse	Protocols for new or experimental treatments/research
Copyright law	Health Information Portability and Accountability Act (HIPAA) Privacy and Security	Quality
Credentialing	Institutional review board	Referrals
Disposal of medical waste	Insurance and other licensure issues	SIH policies and procedures
Document integrity, retention, and authentication	Medicaid and other state regulations	Stark/Anti-kickback
Drug and narcotics issues	Medicare contractor requirements	Tax exempt status
Emergency Medical Treatment and Active Labor Act (EMTALA)	Patient and employee safety	Utilization management
Environmental laws		Wage and hour requirements
		Workplace violence

Seven Program Elements

Compliance Policy and Procedure Development

Effective compliance programs include written standards of conduct. Southern Illinois Healthcare's written standards of conduct are contained in the following documents:

- **Corporate Compliance Program**
- **Policies (Compliance Department and all other departments)**
- **Code of Ethics**

This Corporate Compliance Program sets out the general principles governing the Program. However, an effective Corporate Compliance Program requires detailed standards, policies, and procedures designed to reduce unethical or noncompliant behavior. The Corporate Compliance Officer is responsible for developing and maintaining detailed policies and procedures that govern the operations of the Corporate Compliance Program. Managers within SIH are responsible for maintaining current policies; creating new policies to address compliance issues that affect their respective departments; educating staff on all applicable policies; building processes that support compliance with policies, and testing to verify practices adhere to policies.

Southern Illinois Healthcare's Code of Ethics provides guidance to employees in carrying out their daily activities within appropriate ethical and legal standards. Following the Code of Ethics is one means by which compliance will be achieved.

Corporate Compliance Officer and Corporate Compliance Committee

Effective compliance programs include the designation of a Corporate Compliance Officer and a Corporate Compliance Committee to oversee the operations of the Corporate Compliance Program. Southern Illinois Healthcare has created the position of Corporate Compliance Officer and has also designated a Corporate Compliance Committee. The Corporate Compliance Officer is responsible for the development, implementation, and management of the Corporate Compliance Program for all SIH entities. To increase

the effectiveness and integrity of the Program, the Corporate Compliance Officer has the cooperation of and access to all members of the organization. The SIH Board of Trustees and senior management provides the Corporate Compliance Officer with appropriate resources to effectively manage and satisfy the elements of the Program. Also, the Corporate Compliance Officer has the authority to inquire into any matters arising or appearing to arise within the scope of the Corporate Compliance Program.

The Compliance Officer may appoint such staff as are necessary to assist in the performance of his/her responsibilities. Any members of the Corporate Compliance Department will be treated as the Corporate Compliance Officer for purposes of cooperation with his/her efforts to perform Corporate Compliance Program functions.

General Counsel directs the Corporate Compliance Officer in managing the Corporate Compliance Program and reports directly to the Board of Trustees on Corporate Compliance Program matters. In the event that fraudulent or abusive practices are discovered through compliance investigations or otherwise, General Counsel has the authority to terminate the operation of any department or function within SIH in order to prevent further harm or damage to government programs, commercial payors, other external entities, and/or SIH.

The Corporate Compliance Committee has been established to advise the Corporate Compliance Officer and assist in the implementation of the Compliance Program. The Committee reviews and evaluates compliance activities and reports to and consults with the Board of Trustees and its appropriate committees, as necessary. The Corporate Compliance Committee consists of at least two members of the Board of Trustees, the President/Chief Executive Officer, the Senior Vice President/Chief Financial Officer, the Vice President/Chief Innovation Officer, the Vice President/General Counsel, the Corporate Compliance Officer, and such other members as the Board of Trustees deems appropriate. The Corporate Compliance Officer chairs the Corporate Compliance Committee. The Corporate Compliance Committee meets at least quarterly, but any member of the Committee may call a special meeting.

Each entity within SIH has a designated facility compliance committee. The facility compliance committee is selected by the facility Administrator. The facility compliance committee advises the Corporate Compliance Officer, receives reports of compliance activities within the facility, and assists in the implementation and management of the Corporate Compliance Program at the respective facility. The facility compliance committees meet no less often than quarterly.

Compliance Training

Proper education and training is a significant element of the Corporate Compliance Program. It is important that all members of SIH's workforce are knowledgeable about the Corporate Compliance Program. All new members of the organization's workforce will receive orientation to the Corporate Compliance Program within the first 30 days of employment or assignment to SIH in order to understand his or her role in compliance. Annually thereafter, all employees will receive refresher training in compliance. New managers receive additional training on compliance policies during new manager orientation. Completing required compliance training (including HIPAA) is a condition of employment. Failure to obtain required training by the stated deadline is grounds for disciplinary action up to and including termination. Managers and employees working in areas at high-risk for compliance violations receive additional education and training as necessary. The Corporate Compliance Officer verifies documentation is retained for all workforce members who complete compliance training.

Open Lines of Communication

Open lines of communication are essential to an effective corporate compliance program. Southern Illinois Healthcare has established a Compliance Helpline that provides a venue for confidentially reporting compliance violations or concerns. The Corporate Compliance Officer or other designated individual investigates all reports made to the Compliance Helpline in a prompt, objective, and reasonable manner. There are two methods to access the Compliance Helpline to contact the Corporate Compliance Department anonymously, if desired.

A form is available on the Corporate Compliance Department intranet website. To access the electronic Compliance Helpline

form, select the Departments tab on the intranet home page. The completed form is sent directly to the Corporate Compliance Officer via confidential email.

<https://hub.sih.net/dept/compliance/>

There is also a dedicated phone line. The following Compliance Helpline numbers are available at any time for employees and others to ask compliance related questions or report actual or potential noncompliant activities:

Toll free: 1-800-965-4583

Local: 618-529-2540

The Compliance Helpline is staffed weekdays between 8:00 am and 4:30 pm. After 4:30, confidential voice mail is available.

It is SIH's policy that employees may use the Compliance Helpline without fear of retaliation. This non-retaliation policy applies to the reporting of any compliance violation, regardless of whether it is reported through the Compliance Helpline. In addition, all reports made to the Compliance Helpline will be held confidential to the extent practical.

Enforcement of the Program

An effective compliance program requires enforcement. Willfully violating SIH's Corporate Compliance Program will result in disciplinary action, which will be appropriate for the severity of the activity. Fraudulent and other illegal activities will not be tolerated and will result in immediate termination. Employees are expected to adhere to the Corporate Compliance Program as a condition of their employment at SIH. Failure to do so will result in disciplinary action. Sanctions range from oral warnings to suspension, privilege revocation (subject to applicable peer review procedures), and termination.

Auditing and Monitoring

Periodic audits will be undertaken in order to identify deficiencies in SIH operations, particularly with regard to the claim development and submission process. The Corporate Compliance Officer establishes

appropriate procedures for conducting and documenting such audits and utilizes a risk assessment process to identify and prioritize the areas that pose the greatest risks for compliance violations. The Corporate Compliance Officer develops an annual audit work plan that lists the risk areas expected to be audited and monitored each fiscal year. The Corporate Compliance Officer, Compliance Audit Manager, and auditors or reviewers acting on behalf of the Corporate Compliance Officer will have access to all documents necessary to perform corporate compliance functions, including those related to claim development and submission, business records, cost reports, patient records, pricing and cost data, employee records, schedules, e-mail, and the contents of computers.



Corrective Action

Not only does an effective compliance program include methods for identifying compliance violations such as the Compliance Helpline and auditing and monitoring, an effective program includes methods for responding to and correcting such violations. After a violation has been detected and confirmed, the Corporate Compliance Officer will institute steps to monitor responsiveness to requests for and application of corrective actions to prevent the reoccurrence of the violation and make any necessary modifications to SIH policy. Southern Illinois Healthcare will take appropriate corrective action, including prompt and proper restitution of any overpayment to the affected payor and the disposition of proper disciplinary action. When appropriate, corrective action may include reporting suspected violations to appropriate government agencies. Such reports will only be made after consultation with SIH's General Counsel and upon the approval of the President/Chief Executive Officer.



THE CODE OF ETHICS AND CONDUCT STANDARDS

1. Uphold the mission, values, and ethics of SIH. Respect, integrity, compassion, collaboration, stewardship, accountability, and quality shall be incorporated into SIH's day-to-day operations.
2. Continually work to improve the quality of patient care. SIH will work to identify and meet the healthcare needs of the community it serves. The admission, transfer and discharge of patients are conducted in an ethical manner and in accordance with the application of local, state and federal regulations.
3. Treat patients in a manner that preserves their dignity, autonomy, self-esteem, civil rights, right to treatment, and involvement in their own care. Effectiveness and safety of care, treatment, and services shall not depend on the patient's ability to pay. Patient information shall be kept confidential to the extent allowed by law.
4. Adhere to open and honest business practices. No false or misleading information will be intentionally entered into the business records (including patient medical records) of SIH. All business records shall be maintained for the respective retention period and in accordance with the appropriate department policy.
5. Comply with federal and state regulations and SIH policies and procedures for the accurate and timely submission of claims and other requests for payment from federal, state and private health care programs. Coding on the claims must be based upon appropriate supporting documentation in the medical record that reflects the reasonableness and necessity of the services provided.
6. Enhance the dignity and image of SIH through positive public information. All SIH employees and associates shall be honest in all public statements, advertising, and publicity.

7. Secure and keep confidential SIH's business information.
8. Promote competitive procurement. Selection of subcontractors, suppliers, and vendors shall be made on the basis of objective criteria that include quality, technical excellence, price, delivery, timeliness, service, and maintenance.
9. Follow policies that are designed to prevent employing or billing for services rendered by an individual or entity that is excluded, suspended, debarred, or ineligible to participate in federal and state health care programs.
10. Decline all gifts and other incentives that would improperly influence relationships or business outcomes pursuant to SIH policy. This policy applies to both the giving and receiving of gratuities. Board members and employees of SIH shall disclose any direct or indirect financial or personal interests that pose potential or actual conflicts of interest.
11. Maintain a work environment that is free from harassment (sexual or other), coercion of any kind (especially to perform illegal or unethical acts), and discrimination on the basis of race, creed, color, sex, ethnic origin, age, or disability. SIH acknowledges that a physician or employee may request to be relieved from participating in a patient's care or treatment in a situation where the prescribed care or treatment presents a conflict with deeply held cultural values, sense of ethics or religious beliefs. SIH will not compromise patient care and treatment if such a request is granted.
12. Identify and report potential or true adverse events and hazardous conditions, and implement and support performance improvement processes across the organization to promote the safety of patients, visitors, and the SIH workforce.
13. Comply with all legal and regulatory requirements that are applicable to SIH and its operations. Business decisions shall not be made that compromise this Code, the Corporate Compliance Program, or the law.

14. Report ethical and compliance violations to the immediate supervisor, the Corporate Compliance Department or the Compliance Helpline.
15. SIH will protect the clinical decisions of the Licensed Independent Practitioner. The patient or appropriate representative has the right to share in and approve decisions related to his/her care.
16. SIH's workforce members will follow the ethical standards dictated by their respective professional organization when those standards are more stringent than this Code of Ethics.



Mission, Vision, And Values

The Mission, Vision, and Values of Southern Illinois Healthcare serve as the foundation of the Corporate Compliance Program. The mission of SIH defines the purposes of the organization as envisioned by its Board of Trustees. The values reflect the philosophy of the Board of Trustees and guide the work of all who serve within the organization.

Southern Illinois Healthcare's Mission Statement is as follows:

We are dedicated to improving the health and well being of all of the people in the communities we serve.

Southern Illinois Healthcare's Vision Statement is as follows:

Creating a healthy Southern Illinois made stronger by acts of caring that transform lives.

Southern Illinois Healthcare will accomplish its mission and vision through its values, which are as follows:

RESPECT

Recognizing and valuing the dignity and uniqueness of each person

INTEGRITY

Adhering to strong moral and ethical principals in all we do

COMPASSION

Responding to the feelings and the needs of each person with kindness, concern, and empathy

COLLABORATION

Communicating and working with others for the benefit of all

STEWARDSHIP

Responsibly using, preserving, and enhancing our human and material resources as a not-for-profit, community-controlled organization

QUALITY

Striving for excellence in all we do

ACCOUNTABILITY

Holding ourselves and those around us responsible for living the Values and achieving the Vision of Southern Illinois Healthcare.



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