

ST. CROIX[®]
HOSPICE

STANDARDS OF CONDUCT

Letter from the CEO

These are the Standards of Conduct. Thank you for choosing St. Croix Hospice. The care you provide impacts our patients, families, caregivers and countless others every day. We are proud to have you as a team member.

Our commitment to our patients and families, team members, healthcare partners and payors is to provide high quality care while remaining compliant with the rules and laws that govern our practice. Our organization, including the Board of Directors, employees, contractors and vendors are part of the compliance team and are expected to honor the Standards of Conduct.

These Standards commit all of us to the highest level of ethics, morals and compliance. Our overarching Standards of Conduct includes our mission, vision and values.

We recognize that every team member has an important role in our efforts to maintain the highest ethical standards. These Standards of Conduct will provide you with the guidance including how to confidentially report concerns without fear of retaliation.

Our focus on patients, families, caregivers and each other is the foundation of St. Croix Hospice. The commitment you make will match our commitment and allow us to support our patients on their final journey. Thank you again for choosing St. Croix Hospice.

Warmest Regards,



Heath Bartness, CEO
St. Croix Hospice



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Our Pillars

The pillars of St. Croix Hospice support everything we do, while focusing initiatives where they matter. These pillars form the major categories of our Strategic Plan.



Our Pillars

Mission

St. Croix Hospice's mission is to deliver the highest quality hospice care.

Vision

To achieve St. Croix Hospice's mission, we will lead the hospice industry in:

- **Value:** Delivering measurable results
- **Expertise:** Building superior teams and leaders
- **Innovation:** Embracing technology and creative solutions
- **Stewardship:** Upholding the hospice benefit
- **Satisfaction:** Fostering compassionate services



Our Pillars

Values

I am St. Croix Hospice because **ICARE**

- **I**ntegrity: I serve with integrity
- **C**ollaboration: I enjoy collaboration
- **A**ccountability: I value accountability
- **R**espect: I treat others with respect
- **E**xcellence: I strive for excellence



Culture

St. Croix Hospice fosters a patient-centered culture of caring.



Our Compliance Program

The Job of Everyone

St. Croix Hospice's Corporate Compliance Program continuously monitors compliance within our clinical, financial and sales practices. Compliance education encourages all employees to maintain a continuous vigilance for potential risks.

All of St. Croix Hospice's governing body members, officers, managers, employees, clinicians, contractors and other agents are required to comply with our Standards of Conduct and Policies & Procedures. All must also comply with applicable laws and regulations including federal and state health care program requirements. Contractors and vendors are encouraged to have their own compliance programs and are also expected to comply with St. Croix Hospice's Standards of Conduct.

If it concerns you, it concerns us.

So many rules, regulations, laws and policies make things complicated and confusing, but the patient compliance is simple.

Just call the St. Croix Hospice Compliance Hotline at 844-810-9521.



Our Compliance Program

Basis of Compliance Program

St. Croix Hospice's Compliance Program is designed to promote a culture of ethics and compliance while detecting and preventing fraud, waste and abuse. In order to meet these goals, St. Croix Hospice has based our program on the Office on Inspector General's Compliance Program Guidance which includes:

- **Policies & Procedures and Standards of Conduct:** To guide employees in their day-to-day activities
- **Compliance Officer and Compliance Committee:** To support the goals of St. Croix Hospice
- **Training and Education:** To support team members' knowledge and confidence
- **Auditing and Monitoring:** To ensure compliance efforts are effective
- **Open Lines of Communication:** To provide employees with the resources they need to remain compliant
- **Disciplinary Guidelines:** To ensure employees are consistently treated fairly
- **Responding Promptly to Violations:** To prevent further harm



Our Compliance Program

Prohibiting Kickbacks

Care is taken to strictly adhere to marketing, sales and community awareness practices that are allowable and consistent with the anti-kickback statutes, the civil monetary penalty laws and the OIG program guidance for Hospice agencies.



Our Compliance Program

St. Croix Hospice employees, contractors and representatives who interact with current and potential patients, relatives of patients, physicians, hospitals, discharge planners, contractors, assisted living, nursing and other care facilities will interact within the rules and regulations by ensuring we do not:

- Accept an item or service of value in exchange for a business decision or to influence referrals.
- Solicit, accept or offer any gifts of more than nominal value by or between organization employees, to or from clients/patients.
- Solicit or receive items of value in exchange for providing a supplier access to clients'/ patients' medical records and other information needed to bill any payor.
- Enter into any joint ventures with entities that supply goods and services to the organization designed to induce referrals.
- Engage in improper solicitation or high-pressure marketing with patients.

"To give real service you must add something which cannot be bought or measured with money, and that is sincerity and integrity." -Douglas Adams

Penalties for violations involving kickbacks and inducements include: fines, jail terms and exclusion from participation in federal health care programs.

Q&A

Q: A sales team member has agreed to give a hospital social worker gift cards to the gift shop in return for a referral they give St. Croix Hospice. Is this considered a kickback?

A: YES. This is a violation of federal and state anti-kickback laws. The sales team member should not offer money, gift cards or any compensation in exchange for referrals. The OIG does allow trinkets or nominal value and food to be offered with formal or informal educations. This should be reported to a manager or Chief Compliance Officer

Our Compliance Program

Conflicts of Interest

Using any knowledge or information acquired through one's professional relations with patients and/or St. Croix Hospice to one's own advantage or profit.

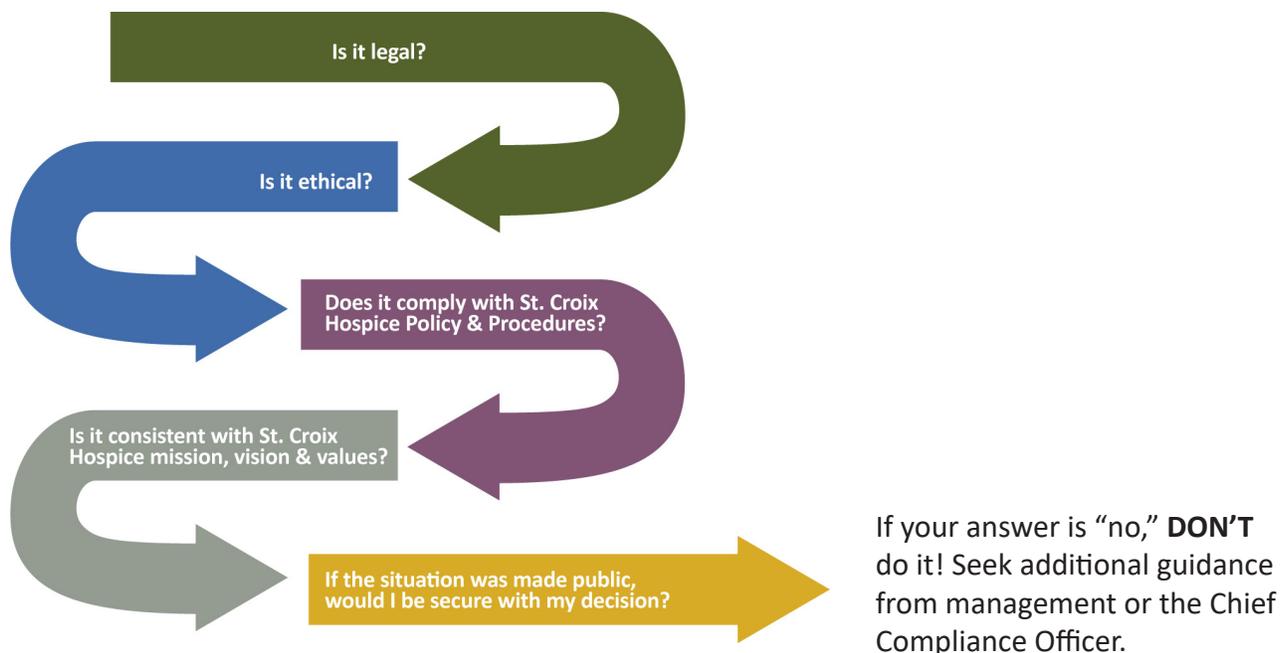
All St. Croix Hospice personnel, including the governing body members, will conduct themselves in accordance with the highest standards of integrity.

There can be no deviation from complete honesty in business transactions.

The use of organization funds or internal business information for improper purposes and dishonest practices is strictly forbidden. St. Croix Hospice is concerned with conflicts of interest that create actual or potential job-related concerns, especially in the areas of confidentiality, customer relations, safety, security and morale.

Making the Right Choice

If you ever come across a situation where you are wondering whether something is a violation, ask yourself these questions:



Our Compliance Program

Duty to Report

Team members are a critical part of the compliance program at St. Croix Hospice. It is the responsibility of all of us to report suspected violations of St. Croix Hospice Standards of Conduct, Policies & Procedures, laws and regulations that govern us.

Please Remember:

- Reports to Compliance are kept confidential to the fullest extent possible.
- Failure to report suspected violations may result in disciplinary action up to and including termination.
- Employees may seek clarification from the Chief Compliance Officer in the event of any confusion or question regarding policy, practice or procedure.

Q&A

Q: When would the anonymity of an employee reporting a violation not be maintained?

A: An example would be if the anonymous employee was given a subpoena (an order to report in a court of law).

Our Compliance Program

How to Report a Compliance Concern

Concerns and potential violations should be reported to the Chief Compliance Officer by:

- Reporting to your supervisor, who has an obligation to take the information to the Chief Compliance Officer.
- Contacting the Chief Compliance Officer directly at compliance@stcroixhospice.com.
- Calling the St. Croix Hospice Compliance Hotline at 844-810-9521.
- Reporting online to: www.stcroixhospice.ethicspoint.com.

The St. Croix Hospice Compliance Hotline is provided through an outside company and is available 24 hours per day. Reports made through the St. Croix Hospice Compliance Hotline may be made anonymously.



Our Compliance Program

Non-Retaliation

As employees and representatives of St. Croix Hospice, we must practice honesty and integrity in fulfilling our responsibilities and comply with all applicable laws and regulations.

All employees are encouraged to raise serious concerns internally so the organization can address and correct inappropriate conduct and actions. St. Croix Hospice requires board members, directors, officers, employees and volunteers to observe high standards of business and personal ethics within their duties and responsibilities.

No employee shall, in any way, retaliate against another employee for reporting an act of non-compliance.

Acts of retaliation should also be reported and will be investigated by the Chief Compliance Officer or his/her designee. Any confirmed act of retaliation shall result in discipline. An employee who retaliates against someone who has reported a violation in good faith is subject to discipline up to and including termination of employment.

Q&A

Q: A manager acts hostile to another after learning he/she reported a non-compliant situation and removes them from supervisory responsibilities. Is this considered retaliation?

A: YES. An employee's responsibilities should stay the same as they were prior to making a report. By the manager taking away supervisory responsibilities, they are presenting a form of retaliation that will not be tolerated.

Our Compliance Program

Disciplinary Protocols

All levels of employees are subject to the same types of disciplinary action for the commission of similar offenses. Supervisors and managers are held accountable for reporting violations that they are aware of or should have been aware of, through the normal course of their duties. Violations of St. Croix Hospice Policies & Procedures may result in disciplinary action including demotion, transfer, suspension without pay or termination of employment.

Civility in the Workplace

One of our core values is respect. Civility, formal politeness and courtesy in behavior and speech are the foundation of respect that should be modeled by every employee. While civility should be followed by every employee, the tone starts with the leaders of St. Croix Hospice creating an environment of mutual respect.

A team that is civil to each other will be collaborative and productive throughout the day.



Our Responsibilities

Maintaining Patient Privacy

St. Croix Hospice will respect and safeguard all protected health information of the patients it serves. Each patient will be provided with information about his/her privacy rights at the time of admission.

Patient's privacy rights include a right to:

- Adequate notice of the uses and disclosures of protected health information that may be made by St. Croix Hospice.
- Request privacy protection for protected health information.
- Access to inspect and retain a copy of his/her protected health information.
- Request that the organization amend protected health information or a record about the individual in a designated record set for as long as the protected health information is maintained in the designated record set.
- Receive an accounting of disclosures of protected health information made by St. Croix Hospice in the six (6) years prior to the date on which the accounting is requested.

Technology and social media pose an additional risk when protecting patient's privacy. Sharing information with anyone other than those involved in the patient's care is a violation of the patient's rights. Relaying information detailed to the patient's care must also be done in a secure format.

Q&A

Q: A nurse just saw a patient who needs a visit sooner than currently scheduled with the social worker. The RN can't find the social worker's phone number or email, but does remember seeing her Facebook account recently. The RN decides to message her on Facebook to update her so she can contact the family and reschedule. Was this the proper way to relay the information?

A: NO. The nurse should have contacted her supervisor if she was struggling with finding the contact information for the social worker. Using outside websites is not secure and poses a risk of information getting into the wrong hands.

Our Responsibilities

Professional Boundaries

St. Croix Hospice team members will always strive to conduct our business activities in an honest, open and fair manner. Even the mere appearance of non-compliant or unethical acts can have a detrimental effect on our success.

The care provided by St. Croix Hospice is deeply personal to our patients and families. Part of the respect we show those at the end of life is to maintain professional boundaries.

Team members agree to:

- Protect the power gained from the profession role and the patient's vulnerabilities.
- Abstain from personal gain at the patient's expense.
- Never ask the patient, family or primary caregiver to attend to staff's emotional needs.
- Remain neutral in the patient's personal relationships.
- Recognize that hospice is a team approach by making calls and visits within normal working hours or within the individualized care plan and documenting all interactions with patients and caregivers appropriately.
- Work within a job description to avoid the promotion of exclusive relationships and not assume the role of the patient's caregiver.
- Acknowledge that soliciting or accepting a loan, money or any object of material value from patients or family members is strictly prohibited.
- Never allow private interests to conflict with those of the patients.
- Never create a disturbance in a patient's home.
- Abstain from obscene or indecent conduct.
- Never perform banking or other financial transactions for patients or caregivers.

Our Responsibilities

Preventing Fraud, Waste & Abuse

St. Croix Hospice is committed to complying with the requirements of our payors including all state and federal regulations and conditions of participation. Violations of the False Claims Acts can result in fines, imprisonment, loss of licensure, or exclusion from participation in healthcare programs.

St. Croix Hospice does not:

- Submit claims for services not rendered or not medically necessary according to the Local Coverage of Determinations.
- Misrepresent the type of service rendered.
- Submit claims for non-covered services.
- Misrepresent a diagnosis in order to submit hospice claims.
- Discriminate based on a patient's inability to pay for hospice services.
- Discriminate against any patient based on race, color, sex, sexual orientation, religion, or national origin.



A Message from the Chief Compliance Officer

On behalf of our entire administrative and clinical teams, I want to thank you for putting your skills to work at St. Croix Hospice and helping us deliver the highest quality of care to our patients and families.

At St. Croix Hospice compliance is the job of everyone. Our compliance program is designed to promote a culture of ethics and compliance while detecting and preventing fraud, waste and abuse.

As a key member of the St. Croix Hospice team, you should always feel encouraged to raise serious concerns internally, so we can address and correct inappropriate conduct and actions as they occur. So many rules, regulations, laws and policies can make things complicating and confusing. The path to compliance is simple; if something concerns you, it concerns us. Talk with your manager or call the confidential St. Croix Hospice Compliance Hotline.

Your commitment to maintaining the highest ethical, moral and compliant standards possible is what allows our team to the high levels of care our patients and their families deserve.

Tami Johnson-White,
Chief Compliance Officer



Compliance Terms

- **Anti-Kickback:** The term “kick-back” is defined as the giving of remuneration, which is interpreted under the law as anything of value. The Anti-Kickback statute is a criminal law that prohibits knowing and willful payment to induce or reward patient referrals or the generation of business involving any item or service payable by federal health care programs.
- **Remuneration:** Payment or compensation received for services. This can include bonuses or other economic benefits that an individual receives for services.
- **Inducements:** Include anything of value and can take many forms besides cash, such as free rent, expensive hotel stays and meals, and excessive compensation for medical directorships or consultancies. The statute covers those who offer payment as well as those who ask for or receive payments.
- **Antitrust:** Antitrust laws designed to create a level playing field in the marketplace and to promote fair competition. Prohibiting such activities as “unfair methods of competition” and agreements in “restraint of trade.” Antitrust laws prohibit any employee – under any circumstance – the authority to approve a violation of law. Relationships with patients and suppliers can also raise antitrust issues. The Chief Compliance Officer should be consulted prior to relationship agreements.

Employee's Acknowledgment of Receipt and Review

I have received the Standards of Conduct. I have read it, have had time to ask questions, understand it, and agree to comply with it. I have been advised that an electronic copy is available to me, and I can request a hard copy. If I have not received a paper copy of the, it is because I have the resources available to me to review the electronic copy.

I understand that St. Croix Hospice has the maximum discretion permitted by law to interpret, administer, change, modify, or delete the rules, regulations, procedures, and benefits contained in the Standards of Conduct at any time with or without notice. No statement or representation by a supervisor, manager, or any other employee, whether oral or written, can supplement or modify this document. Changes can only be made if approved in writing by the Chief Compliance Officer of St. Croix Hospice. I also understand that any delay or failure by St. Croix Hospice to enforce any rule, regulation or procedure contained in the Standards of Conduct does not constitute a waiver on behalf of St. Croix Hospice or effect the right of St. Croix Hospice to enforce such rule, regulation, or procedure in the future.

This document is not intended to preclude or dissuade employees from engaging in legally protected activities under the National Labor Relations Act (NLRA) and applicable state law.

This document supersedes any previous Standards of Conduct document, whether written or oral, issued by St. Croix Hospice.

If I have any questions about the content or interpretation of this document, I will contact Human Resources.

Date: _____

Print Name: _____

Signature: _____