



WinnMed

CODE OF CONDUCT



Table of Contents

Welcome	1
Corporate Compliance Overview	2
Safeguarding Information	4
Ethics	9
Behaving Honestly	10
Financial Integrity	14
Political Activity and Contributions	18
Safety, Health and Environment	20
Diversity, Equity and Inclusion	22
Frequently Asked Questions	23
Compliance Resources	25

Note: Winneshiek Medical Center, DBA WinnMed

Welcome

As described in our mission, WinnMed is a lifelong community partner improving the health and well-being of those we serve through patient centered collaboration worthy of the trust our patients place in us. Our vision states we provide an unparalleled experience as the most trusted partner for health care. This trust is built on the foundation of integrity and commitment to the highest ethical standards that have contributed to the success of WinnMed for over 100 years.

How is trust built? It is through consistent daily actions that give witness to the living of our mission, vision, values. The practice of behaving honestly, ethically and with integrity is an individual responsibility. We make choices every day about how to conduct ourselves as we strive to make the best decisions for our patients, colleagues and the communities we serve.

We want every member of our WinnMed team to have a clear understanding of the professional, legal and personal

expectations in our workplace. Our Corporate Compliance Program, which includes the Code of Conduct, guides our daily work and serves as a resource when we have questions about handling situations we encounter in our daily activities.

Please familiarize yourself with the Corporate Compliance Program and refer to it when you have questions or concerns about a situation you are facing while at WinnMed. Share your questions or concerns with your director or a member of the administrative team. You may also call the Compliance Hotline at 563-387-3003 or extension 83003. Your call is anonymous and held in the highest confidence.

We strive to live by our values, act responsibly, and as a team to “do the right thing”. Thank you for your role in strengthening and sustaining WinnMed’s commitment to the highest standards, for all you do in serving our patients, and being the most trusted partner for health care!

Steve Slessor

Chief Administrative Officer

WinnMed

Corporate Compliance Program Overview

Corporate Compliance Program

WinnMed created the Corporate Compliance Program to reinforce WinnMed's commitment to conducting its business with integrity, to help us achieve excellence in our workplace, and to enhance our ability to achieve our mission. When we behave with integrity, honesty, credibility and mutual respect, we adhere to the highest standards of professionalism, ethics and personal responsibility. By doing so, we aim to be worthy of the trust our patients place in us.

The WinnMed Code of Conduct is a formal statement of WinnMed's

standards and rules of ethical business conduct. Through this Code, we communicate our ethical standards to WinnMed's trustees, officers, employees, those we do business with, and the general public. This Code is an essential part of the Corporate Compliance Program.

It is our responsibility to observe all laws and regulations. We must be honest and forthright in our business dealings. Our integrity, both personal and professional, is our most important attribute. Compliance with the Centers for Medicare & Medicaid Services (CMS), a federal agency that administers the Medicare

program, is absolutely essential for performance of our duties.

Compliance is about doing things right and doing the right things.

The Corporate Compliance Committee

The Corporate Compliance Committee oversees the Corporate Compliance Program. WinnMed's Compliance Officer is available as a resource for questions and concerns about the health care regulatory environment. The Compliance Officer works with department directors, physician leaders and appropriate committees to ensure compliance with complex regulations. The

Committee also provides education on compliance topics for all employees.

The Corporate Compliance Committee receives reports of suspected violations of WinnMed policy, laws or regulations. Every report, whether received directly or through the Compliance Hotline, is thoroughly investigated.

You are expected to comply with this Code of Conduct and its underlying policies and procedures. If you have questions or concerns, it is your responsibility to seek clarification from your supervisor, department director, administrator, or the compliance officer.

You can find additional guidance by accessing the organizational policies found on the Intranet under Policies & Procedures and searching by the word 'compliance'. ■



Safeguarding Information

Confidential Business Information

One way we can support our mission is to protect Confidential Business Information (CBI). CBI is information that is not generally available to the public, including WinnMed's competitors.

Examples of Confidential Business Information (CBI) include:

- Protected Health Information (PHI)
- Financial data and reports
- Business plans & trade secrets

Every employee at WinnMed is responsible for protecting CBI. This includes refraining from sharing CBI through social media. When sharing information outside of WinnMed, it needs to be done in accordance with policy. Employees need to understand different data classifications and their roles as data custodians to protect our CBI.

Information Security

Your job will likely put you in contact with data that needs to be protected. Health care information

is valuable and criminal groups target health care companies to steal it. An external cyberattack or internal misuse of systems and data could result in a data breach or system outage and put the safety of our patients at risk. Everyone who uses WinnMed computer systems and data has an individual responsibility to protect these valuable assets. Follow the simple "Do's" and "Don'ts", located on the following page, to help protect WinnMed data.

For WinnMed **IT Service Desk** Technical Support head online to winmed.freshservice.com/support/home



DO'S

- Encrypt all Protected Health Information (*PHI*) before transmitting it outside WinnMed. Contact WinnMed IT Service Desk with any questions you may have regarding how to encrypt information you plan to transmit externally.
- Create a strong password and never reveal it to others. WinnMed will **never** ask for your password through email.
- Contact the WinnMed IT Service Desk for technical support.
- Treat email tagged as **[External]** with extra care.
- Verify who you are communicating with using trusted contact information.
- Learn how to recognize and report phishing emails by completing required education modules.



DON'TS

- Don't open a link or email attachment from an unknown or unexpected source.
- Don't insert a flash drive or any other peripheral device into any WinnMed computer if the drive was given to you by an unknown source.
- Don't reuse your WinnMed passwords on personal accounts.
- Don't take action based on an email, text message, or phone call from unknown persons.
- Don't buy gift cards for WinnMed staff. WinnMed would never ask you to do this.
- Don't use free web-based tools for collecting and storing information related to your work.



Any portable device, such as a smartphone or tablet that connects to WinnMed networks or systems (including email) must be managed by Information Technology. Any portable device that stores Confidential Business Information must also be equipped with device-level data encryption.

Report problems and suspicious activity immediately to keep our patients, employees, and network safe.

- ***Report suspicious emails or problems with computer systems or hardware to WinnMed IT Service Desk (83760).***
- ***Report problems with medical equipment to BioMed (85272).***

- ***Report suspicious activity on campus to the Administrator On-Call (AOC) (85300).***

Patient Privacy

WinnMed has a longstanding commitment to guard the confidentiality of Protected Health Information (PHI). Protected Health Information (PHI) is any information about a patient that relates to their past, present, or future health conditions, their eligibility for health care, their payment for health care, demographic information or even the fact that they are a WinnMed patient. PHI is often deeply private and personal to our patients, and they expect and deserve to have their information protected.

Maintaining the confidentiality of PHI is the responsibility of everyone at WinnMed. To meet this expectation, you are expected to complete privacy training and understand WinnMed's privacy policies.

PHI is intended to be used only in the course of treatment by WinnMed individuals as they perform their assigned duties. Intentional violations of this policy will not be tolerated and may be grounds for disciplinary action. Disciplinary action may include termination of your employment. In addition to loss of employment, you could be subject to criminal or professional penalties.

Our vendors, suppliers and other third parties must also

safeguard any PHI they receive. Our Privacy and Security Officers help manage these risks by ensuring appropriate safeguards and contracts are in place.

The following principles apply if you wish to review your own record, or the record of a family member or friend:

- You may review your own record once you complete the appropriate form and submit it to Health Information Management.
- You may access a family member, friend or your minor child's record if you are the treating provider. You must document appropriately in this case.

If you are not providing care for a family member or friend, you may *only* be allowed access to their medical records if a written and signed authorization is in the record. ■



DO'S

- Use only the minimum amount of PHI necessary to meet the intended purpose while performing assigned duties.
- Have a legitimate business or clinical need to access, use or disclose PHI.
- Report any known or suspected privacy incident to the Privacy Officer (83106).
- Seek assistance from the Privacy Officer before sharing data with an outside organization or allowing third parties access to our networks or PHI.



DON'TS

- Don't access PHI for curiosity.

Social Media

WinnMed supports staff involvement in community dialogue and participation in social media. Community dialogue is a vital way to make your voice heard on issues that are important to you. Anything you do on social media may carry risks and responsibilities, especially if you are sharing information or opinions about another person. Following WinnMed's Social Media Usage policy can help you navigate these situations successfully. ■



DO'S

- Be mindful of patient privacy .
- Remember WinnMed's values when posting online.
- Be aware of how your words could affect our patients, their families, and our professional reputation.
- Be respectful to all.
- Be professional, use good judgement and be accurate and honest in your communications. Errors, omissions or unprofessional behavior reflect poorly on WinnMed and may result in consequences for you or our organization.
- Use good judgement to ensure your social media activity doesn't interfere with your work.
- If you identify your connection to WinnMed, make it clear you are speaking only for yourself.



DON'TS

- Don't share confidential information about WinnMed or its patients on social media.
- Don't post pictures of patients on social media.

Ethics

WinnMed's policy is to prevent unethical or unlawful behavior, to halt such behavior as soon as possible after its discovery, and to discipline employees who violate the standards in this Code of Conduct. You must comply with this Code of Conduct, seek clarification through the Corporate Compliance Committee when questions or issues arise, and assist in any investigation of wrongdoing.

This Code of Conduct cannot cover all circumstances or anticipate every situation. If you encounter a situation not addressed specifically by this Code, you should apply the overall

philosophy and concepts of this Code to the situation. You also should be mindful of the values listed in this Code for which WinnMed stands. WinnMed's policy is to obey the law. Even when the law is permissive or silent, WinnMed will make choices based on our values of honesty and integrity.

You, our business partners, and the public, must understand that WinnMed cares *how* results are obtained, not just that they *are* obtained. You are encouraged to openly discuss issues with each other and with your director, to record transactions accurately in books and records (including

medical records), and to be honest and forthcoming with internal or external auditors. WinnMed expects honesty in all aspects of your work.

Each of us must help create a culture within WinnMed which promotes the highest standards of ethics and compliance. This culture must encourage everyone in the organization to raise concerns when they arise. We must never sacrifice ethical and compliant behavior in the pursuit of business objectives. ■

Behaving Honestly

CONFLICT OF INTEREST

Avoid situations in which your personal interests could conflict, or reasonably appear to conflict, with the interests of WinnMed. For example, any opportunity for personal financial gain apart from your normal compensation is a potential conflict of interest.

Personal Financial Gain

Avoid any outside financial interest that might influence your decisions or actions as a WinnMed employee, such as:

- A personal or family interest in an enterprise that has a business

relationship with WinnMed.

This restriction does not apply to minimal holdings of a publicly traded corporation that may by chance do business with WinnMed.

- An investment in another business that competes directly with WinnMed. This does not apply if the investment is not a significant part of your or your family's net worth, or the area of competition is minimal.

Outside Employment/Activities

Avoid outside activities that could:

- Have a negative impact on your

job performance or WinnMed's reputation in the community.

- Conflict with your obligation to WinnMed.

VENDORS, BUSINESS PARTNERS, & REFERRING PROVIDERS

When WinnMed enters a business relationship with vendors and other business partners, we create a legal relationship with that organization. WinnMed expects these organizations to act within the legal framework of our contracts. We also expect suppliers and their sales representatives to behave in a manner consistent with WinnMed policy, industry standards, and applicable law.

Because we value the integrity of our business relationships, personal gifts of any kind cannot be accepted from a vendor or business partner of WinnMed. Never solicit, receive, offer to give or give anything of value to physicians or any health care provider for the referral of patients or services. Doing business with vendors, business partners, and referring providers can present ethical and legal problems. The following guidelines are intended to help you make ethical decisions in these potentially difficult situations.

Gifts/Gratuities From Businesses

Personal gifts of any kind are not acceptable under any circumstances.

Suppliers, other companies, or individuals conducting business with WinnMed, or wishing to conduct business with WinnMed, may not give you gifts of cash, food, entertainment, tickets, travel, or other benefits.

Food From Businesses

It is against WinnMed policy for any industry representative to bring or deliver food to any WinnMed site. However, monetary grants from businesses to offset the cost of modest refreshments for bona fide educational meetings may be solicited and accepted, with WinnMed providing the refreshments.

Business Meals

When business meetings include a meal, modest offers of hospitality may be made and accepted by outside business representatives or by WinnMed employees.

Entertainment by Businesses

It is unethical to ask any person or company conducting business with WinnMed for entertainment of any kind (e.g., theater tickets, golf outings, sports events). In particular, you should avoid any offer that is intended to gain favor for business suppliers. You should decline invitations from vendors, pharmaceutical representatives

or business representatives for any entertainment not included in the agenda of a professional educational event, such as national meetings, continuing medical education, and preapproved advisory board meetings.

Agent, Representative or Outside Consultant Payment

Agreements with agents, sales representatives or outside consultants must be reasonable in terms of the value of the service provided and the amount of the payment in comparison to trade practices. Any agreement involving more than \$10,000, or lasting longer than one year, must be in writing.

Kickbacks & Rebates

You or your family must not receive personal kickbacks or rebates as a result of WinnMed's purchase or sale of goods or services. Kickbacks or rebates can take many forms and are not limited to direct cash payments or credits. In general, if you or your family member stands to gain personally from a transaction, that transaction is prohibited. Such practices are unethical and often illegal.

Reciprocity

WinnMed may purchase goods or services from suppliers who also buy goods or services from WinnMed. This practice is normal and acceptable, but any form

of pressure for reciprocity with suppliers is not. You must never ask suppliers to buy WinnMed products or services in order to become a WinnMed supplier.

Never pursue any business opportunity/relationship that would compromise our ethical standards or violate a law or regulation.

Gifts From Patients

When building relationships with our patients, you should not behave in ways that suggest you are benefiting from that patient relationship. Patients may offer you gifts or money. While the gift may be heartfelt, you must consult WinnMed's

Gifts, Gratuities, & Business Courtesies policy for guidance if you are unable to politely decline.

Patients who desire to make a gift to WinnMed should be directed to the WinnMed Foundation.

- Gifts of substantial value that cannot be refused graciously should be delivered to the Foundation.
- All gifts of money must be forwarded to the Foundation.

Some patients may insist on making a personal gift to you that cannot be declined without embarrassing the patient. If the gift is small, you may accept and share it with your coworkers (e.g., flowers or a box of candy). You may keep and use small gifts that cannot be shared (e.g., a necktie).

This topic can be difficult. Seek guidance from your supervisor, administrator, department director, appropriate physician leader, or the Compliance Officer. ■



DO'S

- Disclose all personal financial interests to WinnMed that might influence, or appear to influence, your decisions or actions as a WinnMed employee.
- Consult with your director or the CAO if you have concerns about a potential conflict of interest.
- Behave in ways that support a collegial, honest and fair environment.
- Treat people fairly and don't take advantage of your employee status for personal gain.



DON'TS

- Don't accept gifts of cash, food, entertainment, tickets, travel or other benefits offered by vendors, suppliers, or other companies or individuals conducting business with WinnMed.
- Don't offer or accept any bribes, kickbacks or inducements in connection with performing duties for WinnMed.
- Don't offer, solicit or accept anything of value that could be perceived as an unfair advantage of any kind.

Financial Integrity

USE OF FUNDS & ASSETS

WinnMed assets are to be used solely for the benefit of WinnMed. You may not use WinnMed assets for your personal gain. Assets are more than equipment, inventory, funds, and office supplies. Assets include medical records, concepts, financial data, intellectual property rights, business strategies, and plans about WinnMed activities.

Government Investigations

You must cooperate with government employees conducting investigations. Government investigators have the right to contact you at work or at home for

work-related issues. Administration should be contacted immediately about any unexpected government interview or investigation.

Immediately inform a supervisor or administration about any request for information, investigation or lawsuit, even if the contact occurs at home or after business hours. Do not respond to any subpoena or other request for WinnMed information without first obtaining the approval of the Chief Administrative Officer.

Anti-Corruption Laws

It is illegal in the United States to offer a bribe to any U.S. or

foreign government official in order to get or keep business or influence the official's actions. Bribes include cash, gifts, services, entertainment or anything of value. If a government official involved in a WinnMed transaction asks you for anything of value for their personal benefit, you should immediately contact Administration.

WinnMed is committed to conducting business with integrity and expects the same of anyone conducting business on behalf of WinnMed. If you suspect anyone connected to WinnMed is engaged in corrupt acts, contact the Compliance Officer.

Other Improper Payments

The use of WinnMed funds or assets for any unlawful or unethical purpose is prohibited. Making payment to a third party for any purpose other than that shown in WinnMed's records is prohibited.

Books & Records

WinnMed seeks to provide patients with accurate and transparent information about billing. As health care consumers, patients deserve to know and understand how their money is used to provide care. We offer a variety of tools and services to assist our patients in anticipating future bills.

WinnMed works with many different payers including private and government insurers. Ethically, we must document and bill accurately. WinnMed has a right to appropriate reimbursement and payers have an obligation to be sure dollars are going to medically necessary care. WinnMed's documentation, coding and billing are governed by the fraud, waste and abuse laws. These laws forbid intentional and accidental overbilling. If WinnMed's internal review shows we were overpaid, WinnMed refunds the payer and makes the required disclosures. If you have a concern or question about billing, say something. As

always, reports of good faith are protected from retaliation.

Falsification of Records

Federal law requires that WinnMed's books and records accurately reflect the true nature of transactions represented. You must not create or be a part of creating any record intended to mislead or hide anything that is improper.

- It is against WinnMed's policy to knowingly cause WinnMed's data, records and/or reports to be incomplete and inaccurate.
- Falsifying records can include making records appear as

though payments were made to one person when payments actually were made to another, submitting expense accounts which do not accurately reflect the true expense, or creating any records that do not accurately reflect what occurred.

- Permanent entries in WinnMed records must never be altered.
- Payment may not be made if any amount will be used for a purpose other than described in the documents supporting the transaction.
- Slush funds or similar off-book accounts, in which there is no accounting for receipts or expenditures on corporate books, are strictly prohibited.

- Never make any false or misleading statements to a government agency or a payor.

False Claims Act

WinnMed dedicates many resources to prevent and correct billing errors involving Medicare, Medicaid and its other payers. The federal government and many states have False Claims Act laws to penalize billing fraud, waste and abuse.

If you suspect or discover billing errors or inaccuracies have occurred, you have an obligation to immediately report these to management or the Compliance Committee. Employees who report in good faith will be protected from retaliation. WinnMed will:

- *Operate in accordance with all applicable legal requirements.*
- *Submit for payment only claims for services that were rendered, medically necessary and appropriately document.*
- *Use billing codes that accurately describe the services provided when submitting claims for payment.*
- *Comply with Medicare and Medicaid billing and claims guidelines.*
- *Comply with all codes, regulations and governing organizations.*

Retention of Records

Disposing of WinnMed's records and files is not discretionary. Applicable laws require that certain records be

kept for specific periods of time, particularly records related to:

- Employees
- Health, safety and the environment
- Taxes and finances
- Contracts
- Corporate areas

Relevant records must not be destroyed if any litigation, government investigation or audit is pending. Until the related matter is closed, destroying records to avoid disclosure in a legal proceeding may be a criminal offense. For more information, refer to the departmental policies on document retention.

Ensure that all company data, reports, and records are completely, accurately, and truthfully filed with appropriate agencies. ■



DO'S

- Cooperate with government employees conducting investigations.
- Immediately inform a supervisor or administration about any request for information, investigation or lawsuit.
- Report suspected billing errors to management or the Compliance Committee.
- Ensure data, reports, and records are truthfully filed.
- Retain documents as required by law.



DON'TS

- Don't use WinnMed assets for your personal gain.
- Don't respond to any subpoena or other request for WinnMed information without first obtaining the approval of the Chief Administrative Officer.
- Don't offer a bribe to any U.S. or foreign government official.
- Don't create or be a part of creating any record intended to mislead or hide anything improper.
- Don't make any false or misleading statements to a government agency or a payor.

Political Activity & Contributions

WinnMed is a county-owned, tax-exempt entity and is prohibited from conducting or contributing to political activities. Any use of WinnMed's resources to support or oppose any political candidate or position, or to engage in political fundraising, is prohibited.

WinnMed encourages you to participate in the political process outside the workplace. Your personal political activity, however, should not reference WinnMed or your position at WinnMed. Engagement with patients and families should be done in a politically unbiased manner. Out of respect for our patients, you should refrain from

discussing political views.

As a tax-exempt organization, WinnMed must ask you to follow some basic rules about political activity:

- ***When participating in personal or political activity and advocacy, do not refer to WinnMed as your employer or to your position at WinnMed. For example, do not wear your WinnMed identification badge at those events.***
- ***If your title or affiliation with WinnMed is used to identify you, you must clearly share that your views are your own and do not represent WinnMed.***
- ***Do not otherwise position***

yourself as a WinnMed representative when you participate in political activities.

It is against WinnMed policy, and may be illegal, for you to:

- Enter, directly or indirectly, any political contribution on your expense account that causes WinnMed to reimburse you for that expense. This includes the cost of fundraising tickets for political functions and fundraising dinners. Even if WinnMed business is discussed at such events, it is against policy and possibly illegal to include such

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- costs on your expense account.
 - Use any WinnMed property, facilities, employee time, or WinnMed’s intranet for any political activity. Examples of prohibited actions include: using WinnMed administrative assistant time to send invitations for political fundraising events, using a WinnMed telephone to make political solicitations, allowing any candidate to use any WinnMed meeting room for political campaigning, or using WinnMed property in a political campaign.
 - Use WinnMed’s email to

- communicate personal political opinions to other individuals, elected representatives, government agencies, newspapers, periodicals, or other external organizations. By using your WinnMed email, the receiver may construe your political opinions as official WinnMed policy.
- Use of WinnMed’s letterhead for personal communication is not allowed. ■



DO'S

- Participate in the political process outside the workplace.
- Engage with patients and families in a politically unbiased manner.



DON'TS

- Don't position yourself as a WinnMed representative when you participate in political activities.
- Don't use WinnMed property, facilities, employee time, or WinnMed’s intranet for any political activity.

Safety, Health and Environment

WinnMed is committed to providing a safe and healthy workplace for you, patients and visitors to our facilities. We are committed to providing high quality medical services that are appropriate, safe and in compliance with all applicable laws, regulations and professional standards. This includes employing only personnel with proper credentials, experience and expertise to meet the needs of our patients and the communities we serve. WinnMed is equally committed to wisely managing and sustaining natural resources and minimizing the impact of our operations on the land, air and

water. These commitments are met only through your cooperation.

WinnMed encourages safe patient interactions, and you have the right to feel safe at work when interacting with patients and visitors. If you encounter disrespectful, derogatory or discriminatory behavior, address the behavior in the moment (provided it is safe to do so), contact your director, or use the appropriate campus code call to request assistance. If physically volatile or threatening behavior is encountered, secure your safety and seek support from nearby staff. If you see something unsafe and it is an emergency, call 911.

Each of us has a responsibility to actively engage in safe behaviors to maintain a safe, secure, and healthy environment for our patients, staff and visitors. Behaviors include:

- Abiding by safe operating procedures
- Following WinnMed's safety policies and procedures
- Identifying workplace hazards
- Guarding our own and our fellow employees' health and safety
- Supporting emergency preparedness and response initiatives
- Using pollution control systems



WinnMed strives to provide staff with ergonomically appropriate work areas as part of our commitment to a safe, healthy workplace. If safety or health is compromised, please notify your director. Each of us is responsible for reporting:

- ***Workplace injuries***
- ***Security incidents***
- ***Workplace violence events***
- ***Illnesses***
- ***Patient safety events***

Government agencies review and enforce compliance with safety, health and environmental laws. It is WinnMed's policy to comply with these laws and to cooperate with inspection and enforcement personnel. You are encouraged to report any conditions you believe to be unsafe, unhealthy or hazardous to the environment. ■

Diversity, Equity, and Inclusion

You should treat everyone in WinnMed's diverse community with respect and dignity, including patients, their families and your colleagues.

Equal opportunity in employment and education at WinnMed is a moral and legal obligation.

WinnMed selects, employs, admits, educates, advances, promotes, transfers and compensates each person based on their individual capability, qualifications, performance and potential.

WinnMed also is committed to upholding laws prohibiting discrimination based on race, sex, age, religion, national origin, marital status, sexual orientation,

disabilities, military service or any other classification protected by federal, state or local laws.

Any form of abuse, harassment or intimidation in the workplace is not acceptable and WinnMed will take appropriate corrective actions.

Harassment or illegal discrimination of any kind is unacceptable in our workplace. If someone uses language or behavior that promotes violence or discrimination, this should be reported. WinnMed will investigate and take fair and consistent action.

WinnMed welcomes patients from all backgrounds and cultures

and is committed to maintaining an inclusive environment. At WinnMed, we value and celebrate diversity, equity, and inclusion and understand our community is strengthened when we act with compassion, integrity, consideration and cooperation.

WinnMed provides opportunities for individuals with diverse backgrounds, beliefs, and expressions to bring their true, authentic selves to work. By valuing similarities and differences in all our employees, WinnMed will continue to foster an environment of inclusion that allows us to deliver culturally competent and patient-focused care. ■

Frequently Asked Questions

Why does WinnMed need a Corporate Compliance Program?

WinnMed is committed to a culture that prevents, detects and corrects conduct that does not conform to laws, regulations, WinnMed policy or this Code. Fraud, waste and abuse in health care can result in criminal prosecution, civil liability and fines. The Corporate Compliance Program demonstrates WinnMed's commitment to ethical behavior and provides a means to discover and correct mistakes early. WinnMed does not treat your honest mistakes as fraud.

Why am I required to complete Corporate Compliance training?

Compliance education is an important tool to help you be aware of and understand your responsibilities and accountability. The Corporate Compliance Program defines proper and ethical conduct for doing business. The current health care environment is complex, and the Corporate Compliance Program can help you understand and comply with legal and ethical standards that will protect both you and WinnMed.

What happens if there is a suspected violation of this Code of Conduct?

The compliance officer will investigate the suspected violation. Additional staff may assist with the investigation,

such as physicians, administrators, Human Resources, or the Compliance Committee.

Does the government require compliance programs?

Yes. To participate in government programs like Medicare and Medicaid, applicable laws require WinnMed to have an effective compliance program to prevent fraud, waste and abuse.

Does the WinnMed Corporate Compliance Program apply to me?

The Corporate Compliance Program leads in setting the ethical tone for work conducted at WinnMed. No person's job or position at WinnMed is more

important than preserving WinnMed's reputation for integrity.

The Corporate Compliance Program applies to each of us. This includes:

- WinnMed trustees and officers
- Employees at all WinnMed sites (physicians and allied health staff)
- Contract employees
- Students
- Volunteers
- People who do business with WinnMed

All are expected to follow the standards described in this Code.

- Compliance is everyone's responsibility.
- Each of us who works at WinnMed has

a responsibility to report, in good faith, any known or suspected violation of WinnMed policy, law or regulation.

- Anyone who, in good faith, reports suspected wrongdoing will be protected from retaliation.
- All WinnMed employees must complete annual Corporate Compliance Program training.

What if I need more information about the Code of Conduct?

This Code cannot anticipate every circumstance you may face. If you have questions or see or know about a possible violation of this Code or a law or regulation, talk to your supervisor, administrator, appropriate physician leader or the Compliance Officer.

You can report concerns through the

Compliance Hotline at 563-387-3003 or Extension 83003.

You can find a list of members serving on the Corporate Compliance Committee at their page on WinnMed's Intranet under the Corporate Compliance Charter.

We do business with a company that wants to fly several of us to its headquarters for a meeting. Is this allowed?

No. This free travel must be refused because such arrangements may constitute a conflict of interest. This Code requires you to avoid conflicts of interest or even the appearance of a conflict of interest. If there are legitimate reasons to make such a trip, WinnMed should pay the travel costs.

As a staff member, I receive my medical care here. Is my medical record kept confidential?

Yes. WinnMed policy and this Code require all employees to respect the confidentiality of every patient and his or her protected health information. Confidentiality standards are the same for all patients, including patients who are also employees.

I'm concerned about the health of a coworker and want to do what I can to help. Is it acceptable to look up my coworker's medical record?

No. You may only access patient information as required for you to complete your work. Accessing patient information for any other reason may be grounds for disciplinary action, up to and including termination of your employment.

Compliance Resources

You are expected to comply with this Code of Conduct and the Corporate Compliance Program. To report a suspected violation of this Code, of an applicable law or regulation, or simply to ask questions, use the resources below.

- Visit the Corporate Compliance Committee intranet site found under the Departments & Committees tab.
- Talk to your department leadership or administrator.
- Contact the Compliance Officer at **563-387-5275** or Extension **85275**.
- Call the Compliance Hotline at **563-387-3003** or Extension **83003**.



901 Montgomery Street

Decorah, IA

P: 563-382-2911

WinnMed.org