



COMPLIANCE TRAINING

And

Code of Conduct

For

ALL EMPLOYEES

INSTRUCTIONS:

Review the training information in this packet. Then complete the certifications and return to HR or your manager.



First Call Ambulance Service/E.M.T., Inc. is a leading provider of quality emergent and non-emergent ambulance transportation.

MISSION STATEMENT

Our mission is to administer patient care with knowledge, fostering an atmosphere of compassion, integrity and professionalism, recognizing and satisfying the specific needs of each individual and improving the quality of life.

This mission is achieved by:

- Knowledge of healthcare standards with a focus on the ever-changing practices within the healthcare industry and the local community.
- Respect and compassion for all human life.
- Integrity and honesty of all employees as they portray themselves as public servants.
- Professional responsibility of employees to perform treatment and procedures within their scope of practice.
- Commitment to provide teamwork within the healthcare community to assure that all individual patient needs are satisfied.

CODE OF CONDUCT

The policy outlined below details the company's Code of Conduct and every employee is required to read, understand and certify their intention to follow the Code of Conduct.

Purpose

First Call Ambulance Service, LLC. and Eaton Medical Transport, Inc. , referred to herein as FCA/EMT, Code of Conduct is intended to guide employees in understanding their obligation to follow all laws, including but not limited to federal, state, and local, that apply to FCA/EMT and their employees. The Code of Conducts assists the employees of FCA/EMT to make the right decisions when legal and/or ethical issues arise.

Values

Patients: Our principal responsibility is to our patients. FCA/EMT is committed to providing effective and proper services to our patients, regardless of their race, religion, gender, and/or cultural background. Our patients are cared for by professional medical transport staff with consideration for their privacy and dignity.

Employees: Our employees are invaluable to the services FCA/EMT provides. We recognize the diversity of our staff and strive to provide every employee with a safe and supportive workplace. We acknowledge that it is imperative that our employees are treated with dignity and respect.

Condition of Employment

Adherence with the Code of Conduct, in addition to all other FCA/EMT policies and procedures, is a condition of employment and advance within the organization. Any violation of the FCA/EMT Code of Conduct will subject you to disciplinary action up to and including termination of employment.

You are "out of compliance" if any of the following occur:

- Engagement in any conduct that is considered unethical, illegal, or non-compliant conduct;
- Witness or have knowledge of any conduct that is considered unethical, illegal, or non-compliant conduct and failure to report said conduct;
- Management who fail to act on any unethical, illegal, or non-compliant conduct to which they or an employee has knowledge of or witnessed, and a negligent failure to detect the unethical, illegal or non-compliant conduct.



Employment Status

Nothing contained within the Code of Conduct is intended to alter the employment-at-will relationship, constitute an employment contract, or intended to create legal rights.

Expectations

First Call Ambulance Service is committed to ensuring that personal and professional standards of conduct and ethics are of the highest quality so that we may strive to be an industry leader in Emergency Medical Services. We will strive to comply with all applicable laws and regulations governing our services. We expect that all employees and affiliates will follow the guidelines set forth so that we can fulfill our mission statement and administer exceptional patient care.

Behavior: Treat all persons including patients, families, co-workers, and all healthcare professionals with respect, courtesy, caring, dignity and sense of fairness and with recognition of and sensibility to the needs of individuals from diverse backgrounds (including gender, race, age, disability, nationality, sexual orientation and religion.).

Confidentiality: Respect the privacy of our patients and treat all patient information with confidentiality, security and in accordance with all applicable laws, regulations and professional standards as set forth by Health Insurance Portability and Accountability Act of 1996 (HIPAA).

Conflict of Interest: No employee of FCA/EMT shall become involved with competitors, contractors, patients, vendors, or other companies/persons with a professional relationship with FCA/EMT for personal gain.

Favoritism: No employee shall give preferential treatment to another employee. This does not apply when choosing an employee for advancement or other opportunities based solely on experience and/or certification level in which the new position would require such.

Financial: All monies and assets belonging to FCA/EMT will be used only for appropriate business purposes. All employees are expected to use the financial resources and/or assets of FCA/EMT in the most effective, legal, and ethical manner and not for personal gain.

Gifts: No employee of FCA/EMT is to accept a gift – being money or having monetary value – from a vendor, manager, patient/family or facility for personal gain or benefit. This includes “tips” from a patient and/or family.

Honesty: Communicate openly, respectfully and directly with co-workers, providers, patients and families in order to optimize health services and to promote mutual trust and understanding.

Corporate Integrity

Any person can report concerns, questions, or violation(s) of the code of conduct to local leadership or the company's compliance hotline. Concerns, questions and/or violations will be addressed.

BILLING AND CLAIMS

Billing is expected to be accurate, timely and properly documented. Employees are expected to follow all company, local, state and federal guidelines when billing. All concerns should be reported immediately to local leadership.

Customers with concerns about billing practices should contact the Business Office for resolution. If resolution through the Business Office is unsatisfactory, local leadership and/or the compliance hotline should be contacted for resolution.

EXPECTATIONS FOR TRANSPORTS/PATIENT CARE

Knowledge: Each staff member shall know the most appropriate treatment and protocol for each patient to encourage positive patient outcomes.

Respect: Every patient, family member, customer, and co-worker will be addressed with respect, compassion and empathy for individual situations.

Integrity: Each staff member is expected to be honest, ethical and uphold the strongest of moral principles.

Professional Responsibility: Each staff member is required to know their scope of practice and know how to complete appropriate procedures within your scope of practice.

Commitment: We are committed to working with the patient's healthcare team to ensure the highest quality of care is provided and we will be consistent in our efforts to provide this care.

You cannot go wrong by doing the right thing.

DOCUMENTATION RESPONSIBILITIES

Medical records tell a story about the patient's condition and treatment while in our care.

The story has many audiences which may include:

- Other medical professionals caring for the patient

- Billers submitting for payment
- Insurance companies and/or attorneys determining if care was appropriate

Documentation must be

- Accurate and honest
- Legible
- Complete
- Timely

Documentation must include

- What treatments were received by the patient
- Why the treatments were administered
- Why the patient could not have been transported by other means (i.e. car, wheelchair van, etc.)
- Where the patient was picked up and transported to
- Why the patient was transported to the destination (i.e. to the emergency room for evaluation of a fall with hip pain, etc.)
- Other necessary information is outlined in the Documentation Handbook

“If it isn’t documented it didn’t happen”

Only the clinician that provides care during transport can document and sign the medical record.

Alterations

The medical record is the only real proof of the care, treatment and transport provided to our patients.

If information in the medical record should need to be altered, appropriate techniques must be followed by, drawing a line through the incorrect information, documenting the correct information and initialing that changes were made by the author. In addition, if information is added the author should initial and date the additions.

The following alterations are never permissible

- The use of “white-out” or correction tape of any kind
- Erasers, erasable ink or pencils



- Obliterating the entry by using methods that would make the original illegible
- Use of colored ink (ONLY blue or black ink is acceptable)

Abbreviations

Only standard abbreviations will be used and can be found in each employee's documentation handbook or at www.medabbrev.com. If in doubt about an appropriate abbreviation spell out the word to avoid any confusion.

Communication among clinicians is key to ensuring appropriate and safe delivery of patient care.

RECORD RETENTION

Record retention and storage are governed by local, state and federal laws and regulations. No records should be destroyed outside of the specific policies regarding record destruction.

When and if records are destroyed, it must be done by using the appropriate means so as to protect the confidentiality of our customers. Shredding receptacles are provided at each station for this purpose. Medical records currently in storage will be managed by the Compliance Department by following all rules and regulations.

INFORMATION TECHNOLOGY SECURITY

The information found in the following policy outlines your responsibilities while using First Call Ambulance Service and Eaton Medical Transport's computers, phone and systems.



Acceptable Use Policy

Updated: 02/11/2014

Statement of Purpose:

The following policy will outline the acceptable use of company's IT resources. These policies are in place to protect the employee and company.

Objectives:

1. To protect company's networks and equipment.
2. To reduce the unsolicited commercial email "Spam" that floods the company's mail server.
3. To protect company and its employees from activities that might expose them or company to legal action.

"Company's resources", as used herein, is defined as comprising all computer equipment, including peripherals, that is owned, used or leased by company or its affiliates as well as company's networks, servers and off-site services that company subscribes to.

The connection of any device, regardless of ownership or purpose, to any of company's resources shall constitute use of company's resources.

The policy extends to the use of any company email account or subscription account provided to company by any third party.

While company's administration desires to provide a reasonable level of privacy, users should be aware that the data they create on the company's resources, or while utilizing company's resources, remains the property of company. Management cannot guarantee the confidentiality of information stored on any computer device belonging to company or connected to company's resources.

Employees are responsible for exercising good judgment regarding the reasonableness of personal use.

For security and network maintenance purposes, authorized individuals within company may monitor equipment, systems and network traffic at any time. Company reserves the right to audit networks and systems on a periodic basis for any business purpose.

Passwords must remain secure and personnel are expressly prohibited from sharing accounts. Authorized users are responsible for the security of their passwords and accounts.

All PCs, laptops and workstations should be secured with a password protected screen saver with the automatic activation feature set at 10 minutes or less, or by logging off when the system will be unattended.

Company email accounts are provided for business related communications. We permit employees to provide their company email address to known friends, family and associates. The use of Company email addresses for all other purposes is prohibited.

Any equipment that is connected to company's networks must be approved by company's IT Manager. Approval will be withheld unless there is an active anti-virus program running on the equipment with current anti-virus definitions. This anti-virus software is available from the company's IT Manager.

Under no circumstances is an employee authorized to engage in any activity that is illegal under local, state, federal or international law while utilizing company's resources.

The following activities are expressly prohibited:

- Violations of the rights of any person or company protected by copyright, trade secret, patent or other intellectual property, or similar laws or regulations, including, but not limited to, the installation or distribution of pirated or other software products that are not appropriately licensed, duplication or transmission of copyrighted or otherwise protected materials. This provision also applies to materials that are considered confidential within the company.
- The use of any peer-to-peer file sharing software.
- The use of any bit torrent software.
- The use of any instant messenger software including but not limited to AOL or other chat clients.
- Unless specifically business related, posting or subscribing to newsgroup, on-line discussion boards, social networks or email list groups from company's facilities.
- Posting or subscribing to newsgroups, on-line discussion groups, social networks or email lists using a company email address unless required for reasonable business purposes.
- Violation of company's posted Social Media Policy.
- Participating in any on-line chat unless specifically required for business purposes.
- Revealing your account password to others or allowing use of your account by others. This includes but is not limited to family and other household members when work is being completed at home.
- Using company's resources to actively engage in procuring or transmitting material that is in violation of sexual harassment or hostile workplace laws.
- Effecting disruptions to, or interfering with, any other computer or network.
- Sending unsolicited commercial email "spam", junk mail or any form of advertising.
- Using any form of network monitoring which will intercept data not specifically intended for the employee unless this activity is a part of the employee's normal job responsibilities.
- Circumventing user authentication or security of any host, network or account.
- Providing information about, or lists of, company's employees, customers or potential customers to any third party.



- Unauthorized use, or forging, of email header information.
- Connecting to the Internet, or sending email through, an anonymous proxy server or similar conveyance designed to obfuscate the user's identity.
- Creating or forwarding "chain letters", "Ponzi" or other "pyramid" schemes of any type.
- Installing any software that is not approved by company's IT Manager.
- This policy may be changed at any time, without prior notice, at the sole discretion of company. Any changes will be provided to Employee in writing and shall have the full force and effect as if originally incorporated herein.

Employee's breach of this policy shall be grounds for disciplinary action and may result in termination of employment.

Company's failure to enforce any provision or provisions shall not operate to invalidate company's rights to enforce any of the provisions of this policy including subsequent changes.

Should any provision of this policy be deemed invalid it shall not effect nor invalidate any other provision.



CONCERNS

To achieve our mission we want to address concerns in an effective and timely manner.

The only way to resolve potential issues is to inform local leadership that issues exist. Our goal is to work with you in a leading role and take action. We can achieve our goals and mission by working together.

REPORTING

How to Report

If you are not comfortable reporting concerns to your local leadership, the Compliance Program provides three avenues for reporting.

1. Call our Compliance Hotline:
1-855-606-2619 (toll free)
2. Complete an online questionnaire

www.firstcallemt.ethicspoint.com

Both the phone line and website are completely confidential and are maintained by an independent third party company.

3. Send a letter to:
First Call Ambulance Service
Attention: Compliance Committee – Confidential
1930 Air Lane Drive
Nashville, TN 37210

Responsibility to Report

When reporting you have the option to remain anonymous and withhold your name.

Employees that report their concerns in good faith are protected from any retribution or retaliation by peers and/or leaders.

Concerns of an emergent nature should be sent to local leadership immediately.

When to Report

If you have a concern that could cause harm, or is viewed as illegal, unethical or could be a violation of our Compliance Program you should contact local leadership or report to the compliance hotline.



Code of Conduct Employee Acknowledgment

My signature below indicates the following:

1. I have received, read and understand First Call Ambulance Service’s and Eaton Medical Transport’s Code of Conduct.
2. I understand that I am required as an employee of FCA/EMT to abide by the Code of Conduct, FCA/EMT policies and procedures, and/or federal, state or local laws and my continued employment is conditional upon following said regulations.
3. I agree to report any witnessed violations of the Code of Conduct to their immediate supervisor, management, and/or corporate compliance (corporate integrity).
4. I agree to report any violations of Code of Conduct or violations of federal, state or local laws in which I have knowledge to my immediate supervisor, management, and/or corporate compliance (corporate integrity).
5. I agree to report any indictments or convictions that I incur to my general manager or corporate compliance (corporate integrity).
6. I understand that any violation of the FCA/EMT Code of Conduct and/or any illegal or unethical conduct will result in disciplinary action up to and including termination.
7. I agree that I have and will fully comply with the Code of Conduct and other company policies and procedures.

Employee Signature

Date

Employee Printed Name



Compliance Training Employee Acknowledgement

I hereby certify that I have received, read and understand the Compliance Training set forth in this material.

I represent to First Call Ambulance Service and its subsidiary company(s) that I have disclosed information regarding

- a) Any criminal complaint, indictment or criminal proceeding (involving other than a misdemeanor offense) in which I am named a defendant
- b) Any criminal investigation or proceeding, whether administrative, civil or criminal, relating to an allegation against me of filing false healthcare claims, violating anti-kickback laws or engaging in other billing improprieties.
- c) A (past or present) threatened, proposed or actual exclusion from a federally funded health care program, including the Medicaid or Medicare programs.

I understand that I will comply with the Compliance Program and the company's policies and procedures and I am not aware of any incidents committed by myself or others. Should I become aware of any situations I will immediately report those to leadership or the Compliance hotline.

Employee Signature

Date

Employee Printed Name