



## Memorial Hermann Corporate Compliance

### Accessing the Standards of Conduct and False Claims Policy

#### Corporate Compliance Program

Recognizing the complexity of the various federal, state, and local laws regulating health care, Memorial Hermann Health System has adopted a Corporate Compliance Program. This Program is designed to assist the Board, the System and its employees, medical staff members, and independent contractors to maintain compliance through responsive educational programs, internal monitoring and reporting mechanisms, and Standards of Conduct. To learn more about the Memorial Hermann Corporate Compliance program, visit <http://www.memorialhermann.org/aboutus/> and select “Corporate Compliance” from the menu on the left-hand side of the webpage. If you have any questions or concerns regarding compliance, please contact the Compliance Department at 713.338.4322 or call the Corporate Compliance Helpline at 713.338.4140 or 1.877.448.4140 (toll-free).

#### Standards of Conduct

The Standards of Conduct adopted by Memorial Hermann are intended to ensure we meet our compliance goals in a highly regulated business environment. The Standards of Conduct create a uniform code and provide general guidance when ethical questions arise in the course of your work. Everyone, including employees, medical staff, contractors, vendors, etc., must observe the Standards of Conduct. Access the Standards of Conduct, which are updated periodically, via the Memorial Hermann website. Visit <http://www.memorialhermann.org/aboutus/> and select “Corporate Compliance” from the menu on the left side of the page. Select the “Standards of Conduct” link to view the document.

#### False Claims Policy

In accordance with the requirements of the Deficit Reduction Act of 2005, Memorial Hermann has developed a False Claims Policy. This policy states that Memorial Hermann is committed to complying with all applicable laws and regulations, supports the efforts of federal and state authorities in identifying incidents of fraud and/or abuse and has the necessary procedures in place to prevent, detect, report and correct incidents of fraud and/or abuse in accordance with contractual, regulatory and statutory requirements. You are responsible for complying with the Memorial Hermann False Claims Policy, which can be accessed via the Memorial Hermann website. Visit <http://www.memorialhermann.org/aboutus/> and select “Corporate Compliance” from the menu on the left side of the page. Select the “False Claims Policy” link to view the document.

#### Mandatory Compliance Training

Because Memorial Hermann and its medical staff members and independent contractors provide healthcare and administrative services to the beneficiaries of Medicare Advantage Organizations and/or Medicare Prescription Drug Plans, Medicare requires that you complete Medicare’s General Compliance and Fraud, Waste, and Abuse Trainings within 90 days of your credentialing and annually thereafter. Please note, if you are a Medicare-enrolled provider, then you are deemed exempt from the Fraud, Waste, and Abuse Training requirement. However, there is no such exemption from General Compliance Training requirement.



The CMS Link for the General Compliance Training is <https://www.cms.gov/Outreach-and-Education/Medicare-Learning-Network-MLN/MLNProducts/Downloads/MedCandDGenCompdownload.pdf>

The CMS Link for the Fraud, Waste, and Abuse Training is <https://www.cms.gov/Outreach-and-Education/Medicare-Learning-Network-MLN/MLNProducts/Downloads/CombMedCandDFWAdownload.pdf>

### Acknowledgement of Standards of Conduct and False Claims Policy and Attestation of Completion of Required Training(s)

I have received notification of and I will read and follow the Memorial Hermann Health System Standards of Conduct and the Memorial Hermann False Claims Policy. I have received instructions regarding how to access these documents. I understand that the Standards of Conduct apply to my relationship with Memorial Hermann and that following all laws, regulations, policies and the Standards of Conduct is a condition of that relationship. I understand that this includes the requirement that I annually complete the Medicare General Compliance and Fraud, Waste, and Abuse Trainings. I will seek advice from the Chief Compliance Officer, or I will call the Compliance Helpline with any compliance questions or issues.

My signature means that (1) I acknowledge that it is my responsibility to read and comply with the procedures and policies set forth in the Standards of Conduct and with any new or revised policies located therein; (2) I acknowledge that it is my responsibility to read and comply with the Memorial Hermann False Claims Policy; and (3) I have completed, and will annually complete, the Medicare General Compliance Training, and (4) I have completed, and will annually complete, the Medicare Fraud, Waste, and Abuse Training, or that I am deemed exempt from the Fraud, Waste and Abuse Training by virtue of my status as a Medicare-enrolled provider.

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Signature

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Printed Name

Date

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Position and Department/Division