



Ohio Medical Transportation, Inc.

# The Code Of Conduct: Supporting Right Relationships

“Do those served grow as persons? Do they, *while being served*, become healthier, wiser, freer, more autonomous, more likely themselves to become servants?”

—Robert K. Greenleaf



# Table of Contents

Message from Tom Allenstein, President/CEO.....	3
<b>Why the Code of Conduct is Important</b> .....	4
<b>Code of Conduct: Supporting Right Relationships</b> .....	6
My Relationships with Patients, Their Families and the Customers We Serve .....	8
My Relationships with My Co-Workers and Others Who Serve with Me .....	10
My Relationships with Vendors, Business Partners, and Competitors .....	12
My Relationships with the Government and Other Payers .....	14
My Relationship with MedFlight .....	16
<b>Where to Find Help</b> .....	18
Resources	
Acknowledgement and Certification .....	21



## **Mission**

To provide customer focused medical transportation solutions

## **Vision**

To be the premier provider of medical transportation logistics through innovation and customer focus

## **Our Patients-First Values**

Safety • Integrity • Excellence

Accountability • Compassion

## A Message from Tom Allenstein, President and CEO

MedFlight is a *Patients-First* organization based on our values of Safety, Integrity, Excellence, Compassion and Accountability. These values and our mission (to provide customer focused medical transportation solutions) serve as a compass to guide our organization.

We understand that working in the medical transport industry is extremely challenging, and sometimes the right course of action can be unclear. Our Code of Conduct is intended to help you respond to common questions and issues you may encounter in your daily work. Our Code of Conduct is designed to help support right relationships: relationships with patients and referring agencies; relationships with our co-workers and business partners; relationships with the government and others who pay for the medical services we provide, and relationships within MedFlight.

Our Code of Conduct describes the behaviors and conduct expected of all MedFlight partners, contract workers, executives, board members, business partners, vendors, and others acting on MedFlight's behalf. To further apply our Code of Conduct to common situations encountered in the workplace, we have included sample questions along with answers.

Please review and become familiar with our Code of Conduct, particularly those areas that apply to your everyday work activities. When faced with a difficult decision or uncertainty, you should ask questions and seek guidance from your supervisor or other appropriate resource. Most importantly, you are responsible for speaking up about behaviors or actions that may be inconsistent with our Code of Conduct. If you have a question or concern that is not specifically addressed by our Code of Conduct, please consult one of the many resources listed in the *Where to Find Help* section on page 18.

As stewards of resources shared by OhioHealth, The Ohio State University Wexner Medical Center and Kettering Health Network, we are expected to represent them through our competence as care givers, through our ethical business practices and our consistent reputation as a premier provider of critical care transportation in Ohio and the United States.

### **Non-Retaliation Policy**

MedFlight policy prohibits any form of retaliation or intimidation against MedFlight partners for good-faith reporting of harassment, a policy violation, a compliance concern, or for the good-faith participation in any investigation or other proceeding related to such a report, even if MedFlight ultimately concludes that there was no violation.

Any acts or believed acts of retaliation should be reported to the partner's direct supervisor, to any member of management, any member of the Human Resources department or the Corporate Compliance Officer. Violations could result in disciplinary action, up to and including termination of employment, or termination of business relationships, as applicable in accordance with MedFlight's policies.

Thank you for your commitment to provide high-quality, safe, and effective services to the patients and communities we serve.

*Tom Allenstein*  
*President and CEO*

MedFlight's Code of Conduct provides guidance to all MedFlight partners and others acting on MedFlight's behalf. MedFlight and each of us as individuals are held accountable for our behaviors and actions. In addition to supporting our mission, vision and values, the Code of Conduct also assists in ensuring that our actions and behaviors are consistent with the numerous legal, ethical and professional obligations that apply to our organization. Actions and behaviors that are inconsistent with the Code of Conduct can significantly harm

relationships with patients, communities, business partners and others we rely upon to assist us in the delivery of our services.

Individuals will be held accountable for actions and behaviors inconsistent with the Code of Conduct. Violations could result in disciplinary action, up to and including termination of employment, or termination of business relationships, as applicable, in accordance with MedFlight's policies.

## Why the Code of Conduct is Important

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### Our Responsibilities

The Code of Conduct applies to all MedFlight partners, contract workers, executives, board members, business partners, vendors, and others working on MedFlight's behalf.

*You are accountable to:*

- Review and follow the Code of Conduct, the policies outlined in the Partner Manual, and all Standard Operating Policies, paying particular attention to those areas that apply to your everyday work activities.
- Ask questions when you are uncertain what to do or to speak up when you are concerned about behavior that is inconsistent with the Code of Conduct. See Page 18, *Where to Find Help*, for a listing of resources available to answer questions.
- Serve as a role model for our mission and values by carrying-out your responsibilities with the highest degree of personal integrity.
- Understand and embrace the models of Servant Leadership and Just Culture that promote trust, open communication, and respect.
- Encourage others to raise issues and concerns so they can be appropriately addressed.
- Support and promote our policy of non-retaliation for anyone who raises issues and concerns in good faith.
- Learn and follow applicable laws and regulations that affect business activities. See page 14 for further information.

## Servant Leadership

*“The best way to find yourself is to lose yourself in the service of others.”*

- Mahatma Gandhi

As providers of a very vital role in health care we are called to serve not because of money or fame but out of the love for human life. Since I first had a calling to care for people I have recognized that my role was destined to serve. Throughout my nursing career as well as my years in leadership, I have had my share of happy and sad moments but they have all been rewarding to know that I was there to serve.

At MedFlight we will continue to practice Servant Leadership. In order for our patient care teams to function at their highest levels of service for their patients, they must have an awareness that the people they report to respect and care for them as people—not just see them as employees. Likewise, in order for support staff to realize their greatest levels of fulfillment in their work they must experience care and support from their direct supervisor and from their peers. This is the essence of a Servant Leadership culture as described by Greenleaf: do those served grow as persons; do they while being served, become healthier, wiser, freer, more autonomous, more likely themselves to become servants?

*Tom Allenstein*

## What is a Just Culture?

- It refers to a way of thinking that promotes a questioning attitude, is resistant to complacency, is committed to excellence, and fosters both personal accountability and corporate self-regulation.
- It is an atmosphere of trust in which people are encouraged (even rewarded) for providing essential event-related information, but in which they are also clear about where the line must be drawn between acceptable and unacceptable behavior.

## What are the Benefits of a Just Culture for MedFlight?

- A Just Culture will lead to more reporting and feedback using such tools as unusual occurrence and MedDebrief reporting. We will be able to identify trends that will provide opportunities to address latent conditions/risks.
- Just Culture builds trust and enhances accountability.
- Just Culture clearly establishes acceptable versus unacceptable behavior. If done properly in a collaborative environment, Just Culture makes all MedFlight partners responsible and accountable for such things as morale, commitment, job satisfaction and the will to do that little extra. This contact, as well as the resulting common understanding of where the lines are drawn for punitive actions, enhances the trust that is at the core of developing a Just Culture.
- Just Culture develops a more effective safety and operational management system.
- It is expected that a Just Culture will enhance MedFlight’s effectiveness by clearly defining a partner’s job performance expectations, establishing clear consequences for deviation from Standard Operating Policies (SOPs) and promote the continuous review of SOPs.

*“One of the great ironies of life is this: He or she who serves almost always benefits more than he or she who is served”*

- Gordon B. Hinckley

*(15<sup>th</sup> President of the Church of Jesus Christ of Latter-day Saints”)*

**The Code Of Conduct:**  
**Supporting Right Relationships**





Virtually everything we do at MedFlight is dependent on maintaining *right relationships*. We have relationships with our patients, their families and the customers we serve, relationships with MedFlight partners and others who serve with us, and relationships with vendors, business partners, payers, competitors and others involved in our delivery of health care services. *Right relationships* are essential to fulfilling our mission and achieving our vision.

MedFlight is committed to ethical conduct that supports *right relationships*. The Code of Conduct further describes this commitment using common examples often encountered in the workplace.

MedFlight exists to provide patients with access to safe, high-quality and timely transport from their location to an appropriate level medical center. Our *Patients-First* values require us to always consider the patient's care as our primary concern. To successfully fulfill our commitment to patients, all partners at MedFlight must know and understand our internal and external customer needs and requirements.

# Patients First

## My Relationships with Patients, Their Families and the Customers We Serve

### What is Expected of Me?

- Maintain mission readiness: be prepared for timely response to all mission requests.
- Deliver services with compassion, dignity and respect for everyone in your care, including their family members and other representatives.
- Maintain a positive, courteous and customer-service oriented attitude and approach to those you serve.
- Speak kindly and patiently to patients, their families and others.
- Act in the best interests of patients and others you serve.
- Respond to requests for information, input or assistance from customers, patients, family members and other representatives in a timely and supportive manner.
- Incorporate MedFlight's Safety Management System, Quality Management System and all Standard Operating Policies into your actions to ensure a safe transport environment and quality patient care.
- Involve customers, patients, their family members and representatives in care decision-making, including respecting patient and family preference, when appropriate.
- Maintain complete, timely and accurate patient care records.
- Provide post-transport communication to the referring customer.
- Protect the privacy and confidentiality of all medical and other information of those in your care.

### Frequently Asked Questions

**Q:** What should I do if I receive calls from a patient or patient's family wanting copies of their patient care record?

**A:** Patients are entitled to receive copies of all or a part of their patient care record in accordance with MedFlight's policies, and federal and state laws. All requests for copies should be referred to MedFlight's Medical Records Clerk (SOP 300-56 HIPAA Policy on Patient Authorization to Release Medical Information and Consent for Release of Medical Records Form).

**Q:** A sheriff appeared at the base with a subpoena for a patient's medical record. What should I do?

**A:** Refer all subpoena or other external requests for medical records to the Medical Records Clerk and the Vice President of Legal affairs and Risk Management.

**Q:** One of my co-workers asked me if I transported their neighbor who was in a serious motor vehicle accident. He wanted to know what was wrong with his neighbor and how extensive his injuries were.

**A:** A major goal of the HIPAA Privacy Rule is to assure that individuals' health information is properly protected. The fundamental principle is that all partners need to be sensitive about the importance of maintaining the confidence and security of all material we create or use that contains patient care information. Co-workers should not have access to information that is not necessary for them to complete their job.

## Health Insurance Portability and Accountability Act (HIPAA):

HIPAA is a federal law that requires health care providers and other “covered entities” to protect the privacy and security of patient health information, and provides patients certain specific rights related to their health information. You should be familiar with MedFlight’s policies to protect the privacy and security of health information. Please contact the Privacy Officer (Vice President of Legal Affairs and Risk Management) if you have questions or need further guidance related to HIPAA. All MedFlight partners are required to complete annual HIPAA education via MedFlight’s online learning management system.

## What is a Quality Management System (QMS)?

It is a set of objectives and processes of an organization designed to focus the organization toward quality and customer satisfaction.

A system that focuses on the achievement of results in relation to the quality objectives, to satisfy the needs, expectation and requirements of the customer.

## What is a Safety Management System (SMS)?

It is a pro-active integrated approach to safety management and defines the policies that govern the safe operation of our company.

MedFlight’s commitment to a corporate safety culture is defined in the Safety Mission Statement: To foster our development of structured business plans to ensure safety, to manage risk, to reduce accidents and safety significant events, while increasing our operational efficiency.

The MedFlight Safety Management Plan is made up of four processes which include:

- Risk Management
- Policy
- Safety Promotion
- Safety Assurance

The processes in place will not work without the active involvement of all leadership and partners, who, through planning and review, must continue to drive efforts for continuing improvement in safety and safety performance. This is considered a “top-down, bottom-up system”.



*Safety*

The delivery of high-quality, effective patient care requires teamwork and accountability among all individuals involved. Data shows that the work environment has a direct effect on the quality and safety of care delivered. Trust and respect are important factors toward ensuring that all MedFlight partners utilize their talents, perspectives and ideas to the best of their abilities. At MedFlight, everyone is expected to treat others as they would like to be treated.

## My Relationships with My Co-Workers and Others Who Serve with Me

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### What is Expected of Me?

- Treat others with honesty, dignity, fairness and respect.
- Maintain a positive, courteous and customer-service oriented attitude and approach. Speak kindly and patiently to your co-workers and others who serve with you.
- Commit to working with others in a supportive, team environment.
- Support co-workers in providing excellent care and services by responding to requests for information, input or assistance in a timely manner.
- Communicate with others in a clear, open and honest manner.
- Attempt to address any differences you have with co-workers directly with the individuals involved.
- Respect the diversity of others, including age, sex, color, race, national origin, ancestry, religion, military or veteran status, sexual orientation, and disability.
- Abstain from unwelcomed physical contact with co-workers and others who serve with you. Report harassment, intimidation, disruptive behavior, or violence of any kind that you witness in the workplace. See page 18, *Where to Find Help*, for a list of resources.
- Respect the individual privacy of co-workers and others.
- Model your workplace behavior on the Code of Conduct, Partner Manual, and Standard Operating Policies.
- Use CRM (crew resource management), TEM (threat & error management) and hold others accountable as well.
- Professionally call out peers for safety violations or behaviors inconsistent with MedFlight's Safety Management System.
- Support new MedFlight partners during their orientation process by ensuring they receive every opportunity to be successful in their new role.
- Adapt to and support organizational change.

## Frequently Asked Questions

**Q:** I know of a partner who is offended by the language and inappropriate humor one of his co-workers uses when on-duty. What should I advise the partner to do?

**A:** You should advise the partner to speak directly to their co-worker about their concerns. If the partner is not comfortable speaking directly to their co-worker or does not get a resolution, they should report the matter to their direct supervisor or a member of Human Resources.

**Q:** I have two partners on my team that don't seem to get along. One of these partners reported to me that her co-worker often publicly criticizes her job performance and skill level, raises his voice (practically screaming) at her in front of patients and believes that he is spreading vicious rumors about her to other peers. Is this just a personality conflict that they need to resolve?

**A:** The reported behavior should be taken seriously and could be considered workplace bullying if it is actually occurring. As their supervisor, you need to investigate and discuss the situation with Human Resources. If these behaviors are occurring, they must be stopped immediately. Any partner participating in bullying behavior would be subject to disciplinary action.

**Q:** I have been asked to precept a new partner. Will I be held accountable if he does not successfully complete his orientation?

**A:** You cannot be held accountable for the actual performance of another partner. However, you would be held accountable of ensuring that the new partner was given every opportunity to be successful. If you perform your preceptor role to the best of your ability by offering educational opportunities, working with the new partner on any identified weaknesses, reviewing equipment and policies and offering/documenting constructive feedback you will have performed your role successfully.

# Accountability

*“Only a life lived for others is a life worthwhile.”  
—Albert Einstein*

## MedDebrief

MedDebrief is MedFlight's event reporting system designed for MedFlight partners to document events and near-misses related to key segments of a transport mission:

- Clinical
- Operational
- Safety
- Miscellaneous
- Infection Control

Designed by the MedFlight Information Services team, it is available to all clinical partners via the MedFlight Intranet.

MedFlight partners and other individuals working on behalf of MedFlight have a duty to act in the best interest of the organization. This means avoiding situations where relationships with vendors, competitors or other business partners could appear to influence decisions you make involving MedFlight.

Executives, as well as board members, must be particularly sensitive to actual or potential conflicts of interest. As a tax-exempt organization, transactions involving MedFlight executives and board members are subject to special laws and regulations. Failure to follow these regulations can result in significant fines and penalties against MedFlight and the involved person, including managers who authorize such activities.

## My Relationship with Vendors, Business Partners, and Competitors

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### What is Expected of Me?

- Maintain a positive, courteous and customer-service oriented attitude when interacting with vendors and business partners.
  - Maintain objectivity and avoid actual or potential conflicts of interest that might interfere with your responsibilities at MedFlight. When dealing with conflicts of interest, always remember that an appearance of improper conduct can have an impact.
  - Make decisions in the best interest of MedFlight.
  - Follow MedFlight's policies addressing conflicts of interest. In general, these policies require that you discuss and obtain the advance approval of the Chief Executive Officer for any situation that could present an actual or potential conflict of interest with your work at MedFlight.
- The following are a few examples of activities that can create a conflict of interest:*
- **Gifts and Entertainment:** MedFlight partners acting in an advisory capacity on the selection of any vendor shall not solicit or accept any gifts, favors or hospitality from actual or potential suppliers under circumstances which might influence their decision making or actions affecting the MedFlight organization.
  - **Outside Employment:** MedFlight partners are prohibited from being affiliated as an owner, officer, director, member, manager, employee, independent contractor, consultant or agent with any organization that competes with any business segment of MedFlight.
  - **Service on Outside Boards:** MedFlight partners are encouraged to actively participate in various charitable or civic organizations that benefit our communities. The approval of the Chief Executive Officer should be obtained before accepting an appointment to the board of any industry-related organization that may represent a conflict of interest.
  - **Financial Interests:** It is generally considered to be a conflict of interest to do business with, or recommend that MedFlight do business with a company in which you or a family member has a financial interest (excluding investments in large, publicly-held companies) or business relationship. Obtain the advance approval of the Chief Executive Officer in all such situations.

## Frequently Asked Questions

**Q:** I am considering a part-time position with another critical care transport service that we have a partnership with. Would I be allowed to work for this other organization?

**A:** Any time you are considering employment with another medical transport company you should discuss it with your supervisor and Human Resources. MedFlight's executive management will then determine if such employment would be considered a conflict of interest. The individual circumstances would be discussed with you.

**Q:** One of our vendors has offered me gift certificates to local restaurants due to the amount of business we do with them. Am I allowed to accept these gift certificates?

**A:** Per SOP 300-26 Corporate Compliance, Partners may accept items/gifts of nominal value (generally under \$50.00) although you should not accept a gift from a vendor when the offer is based on the amount of business we do with them. Promotional type items are permissible such as T-shirts, golf balls, pens, holiday food packages, etc. When in doubt, the partner should contact the Vice President of Legal Affairs and Risk Management /Compliance Officer for direction.

*“Many attempts to communicate are nullified by saying too much.”  
—Robert K. Greenleaf*

### **Conflict of Interest:**

A conflict of interest exists whenever outside activities or relationships influence—or would appear to influence—your decision-making.

**H**Health care organizations, including MedFlight, are subject to numerous laws and regulations that impact how we deliver health care services. In addition, our federal and state governments are responsible for the payment of a significant portion of the health care services we provide to patients covered by the Medicare and Medicaid programs.

Many laws and regulations are complex and challenging to apply in our rapidly changing industry. Nevertheless, MedFlight is committed to fully complying with all laws and regulations that apply to our health care services.

## My Relationships with the Government and Other Payers

### What is Expected of Me?

- Act with honesty and integrity in all your business activities involving MedFlight.
- Follow all laws and regulations that apply to your work and ask for assistance if you have questions about how they affect you. See page 18, *Where to Find Help*, for a listing of resources available to answer your questions.
- Follow all requirements of government (e.g. Medicare and Medicaid) and other third-party payers, such as insurance companies, who pay for the health care services we provide. These requirements generally include maintaining complete and accurate medical records, submitting only complete and accurate claims for services provided, and protecting the privacy and security of the health information we collect.
- Participate in training and education offered by MedFlight on those laws and regulations that apply to your work responsibilities.
- Cooperate with any government investigation. Never, under any circumstances, destroy or alter documents requested as part of a government investigation, or lie or make false statements to a government investigator. In addition, never offer gifts or other items of value to government representatives.
- Be familiar with and follow the laws and regulations (Stark, Anti-Kickback & Internal Revenue Service) that affect business activities with physicians or other organizations that refer patients to MedFlight.

### Frequently Asked Question

**Q: Do I Have a Relationship with the Government?**

**A:** It may surprise you, but the answer is “yes”! While many federal and state laws and regulations that apply to our health care operations may not apply directly to the work you do, it’s important for you to be aware of these requirements and to understand how they affect our organization.



## What Does Tax-Exempt Status Mean?

MedFlight is a non-profit, tax-exempt organization. The profits are used to sustain or improve the company and are not paid to individual owners. Our tax-exempt status requires us to follow a number of additional laws and regulations that generally prohibit the following:

- Paying more than “fair market value” for goods and services.
- Providing goods or services to others at less than “fair market value”, unless specifically allowed by federal or state law.
- Improper use of organization assets for the benefit of board members, executives and others in a position of substantial influence over the business activities of our organization.
- Engagement of tax-exempt organizations in substantial lobbying activities.
- Direct or indirect campaigning for or against the election of any candidate for public office, including the donation of organization funds to any political campaign.

## What is Fair Market Value?

In general, goods and services are at “fair market value” when their price is reasonable and consistent with current prices in the community for the same or similar goods and services. Contact your Vice President of Legal Affairs and Risk Management/Compliance Officer if you have additional questions or need further guidance.

# Integrity

## What is Fraud and Abuse?

There are many federal and state laws designed to protect government programs, such as Medicare and Medicaid, and other third-party payers such as commercial insurance companies that pay for health care services. The fraud and abuse laws generally prohibit the following:

- Submitting inaccurate or misleading claims for services provided.
- Submitting claims for services not provided.
- Submitting claims that don’t meet payer requirements (E.g. coverage for services).
- Making false statements or representations to obtain payment for services or to gain participation in a program.
- The offer or payment of money, goods or anything of value in return for the referral of patients to a health care provider.
- Offering or giving something of value to patients to encourage them to use or purchase health care services.

As MedFlight partners, we have committed our careers to helping others. MedFlight is unlike any other company in the world because of our unique team. We can work as a team because we know what is expected of each of us; we have special skills and resources to do the job and we have guidelines to follow.

The following bullet points contain the overview of the expectations of individual MedFlight partners and for MedFlight as an organization. If we take care of each other first, our efforts will result in a team that serves our patients and customers with a *Servant's Heart*.

## My Relationship with MedFlight

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### What is Expected of Me?

- Support MedFlight's mission, vision, values, and Servant Leadership philosophy through your behaviors, actions, and decisions.
- Represent the organization honestly and ethically in all your work activities and ask for assistance if you have questions. See page 18, *Where to Find Help*, for a listing of resources available to answer your questions.
- Properly use and protect MedFlight resources including supplies, equipment, staff time and talents, and financial assets.
- Prepare and maintain accurate and complete financial records including accounting, budgeting, time and attendance, expense and other financial data and information.
- Retain all clinical, financial and partner records in accordance with MedFlight's record retention policies.
- Properly use and protect the confidentiality of business information you use or encounter in your work with MedFlight.
- Maintain appropriate professional licenses, certifications and other credentials required of your position.
- Commit to your ongoing learning and development through timely completion of education and training assignments.
- Follow your job description, Standard Operating Policies and legal mandates/regulations as related to your position.
- Accept responsibility and accountability for quality performance for internal and external customers.

- Know your own duties and how to do them promptly, correctly and pleasantly while maintaining a positive team attitude.
- Professionally voice your opinions and contribute your suggestions to improve the quality of MedFlight through active participation in committee meetings and work groups.
- Participate in MedFlight's Safety Management System by reporting safety and risk concerns, events and near misses.

### What Should I Expect From MedFlight?

- MedFlight management will treat you with honesty, dignity, fairness and respect.
- MedFlight will provide a safe and supportive work environment free of harassment, intimidation, disruptive behavior or violence.
- MedFlight will provide encouragement and support for your continued learning and development.
- MedFlight will provide resources for your training and development to assist your understanding of the various laws, regulations and the organization's policies that apply to your work.
- MedFlight will promote a respectful work environment that allows you to freely ask questions, seek clarification when needed, and raise issues and concerns in good faith without fear of harassment or retaliation.

- MedFlight will respond to your requests for information, input or assistance in a timely and supportive manner.
- MedFlight will select partners for hire/promotion on the basis of skill, training, ability, attitude, and character without regard to age (40 or older), sex, color, race, national origin, ancestry, religion, military or veteran status, sexual orientation, disability, and any other characteristic protected by applicable law.
- MedFlight will keep all partners informed of the progress of the organization in relation to strategic plan, mission, and vision.
- MedFlight will promptly investigate and take appropriate action on any complaint, policy violation or performance issue in accordance with Just Culture.

### Frequently Asked Questions

**Q: I was cleaning out some file cabinets at my base and found old reports and documents. I was told by my co-workers to throw them away. What should I do?**

**A:** As MedFlight partners we are all responsible to review and follow MedFlight's Record Retention Policy SOP 300-43. Record retention periods are governed by federal and state laws and regulations. MedFlight needs to ensure that necessary records and documents are adequately protected, maintained and available in the event of a governmental audit, investigation, or pending litigation. Any questions regarding record retention should be discussed with the Compliance Officer.

**Q: I know of a partner who has downloaded software onto our base computer so he could work on a non-MedFlight project. Who should I inform?**

**A:** You should inform the Director of Information Services and your manager. Installation of any software without express permission of the Director of Information Systems is not allowed and must be reported. Inappropriate use exposes MedFlight to risks including virus attacks, compromise of network systems and services, breach of patient confidentiality and other legal claims.

# Excellence

**When faced with a difficult issue or situation where you are unsure what to do, the following questions may assist you in making the right decision.**

### Questions to Ask Yourself

- Is the decision inconsistent with the mission and values of MedFlight?
- Will the decision negatively affect the quality of patient care?
- Would I be uncomfortable telling my family about the decision or having it described on television or in a newspaper?
- Could the decision negatively impact the reputation of MedFlight if made known to the public?
- Could the decision negatively impact commitments the organization has made with partners, customers or the communities we serve?
- Is there something about the decision that bothers me, makes me feel uncomfortable, or just doesn't "feel right?"

**If the answer to any of these questions is "yes," seek the assistance of one of the resources listed within this document (see page 18).**

Delivering health care services is an increasingly challenging task, with complex and ever-changing rules and regulations that apply to our operations. As a result, there will likely be times when the answer to a particular issue or situation is not clear. As a partner of MedFlight, you are responsible for seeking answers to your questions or concerns. Fortunately, many resources and options are available to assist you. Remember, no one is penalized for raising a concern or issue.

## Where to Find Help: How to Raise a Concern or Ask a Question

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### Resources

**Your Supervisor or Regional Director:** This is usually the best place to start in getting answers to your questions. Because this individual understands the work you do, he or she may already have the information you need or can direct you to the right resource.

**Human Resources:** MedFlight's Human Resources staff can likely answer many of your questions, including assisting you in addressing workplace-related concerns.

**Vice President of Legal Affairs and Risk Management:** If you have questions or concerns related to patient care or workplace safety, you may also contact the Vice President of Legal Affairs and Risk Management or the Safety Officer.

**Safety Officer:** Contact MedFlight's Safety Officer if you have questions or concerns related to workplace safety.

**Privacy Officer (Vice President of Legal Affairs and Risk Management) is assigned as the (Privacy Officer):** Contact MedFlight's Privacy Officer if you have questions or concerns related to the use and/or protection of patient health or confidential business information.

**Corporate Compliance Officer (Vice President of Legal Affairs and Risk Management) is assigned as the Corporate Compliance Officer at MedFlight):** The Compliance Officer can assist you in obtaining answers to your questions and concerns. Known or suspected violations of local, state or federal law or regulations should be reported to the Compliance Officer or the Chief Executive Officer.

**Chief Executive Officer:** Known or suspected violations of local, state or federal law or regulations shall be reported to the Corporate Compliance Officer or the Chief Executive Officer.

## Other Resources

We encourage you to use one of the resources listed here to address your questions and concerns. However, if you are not comfortable using any of these resources, or if these resources have not fully resolved your concern, you can use one of the following resources:

- Compliance Officer Hotline 866.397.2989
- File a report on-line at [intranet.medflight.com](http://intranet.medflight.com) under Partner Resources Corporate Compliance section (internal MedFlight partners only).

### **Remember:**

The most important thing you can do is to keep asking questions until you are comfortable with the answer.

*“Genuine leadership demonstrates the power of love, rather than the love of power.”*  
—Rod Crane, Founding President of MedFlight

## Anonymous Reporting

- Both the Compliance Officer Hotline and online reporting allow for anonymous reporting of concerns.
- If the reporter chooses to be identified, he/she will receive feedback.
- All concerns will be investigated.

## Where to Find Help: Contact Numbers

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Human Resources June DeLeo, Director of Human Resources	614.734.8021	<a href="mailto:jdeleo@medflight.com">jdeleo@medflight.com</a>
Risk Manager, Privacy Officer and Corporate Compliance Linda Hines, Vice President of Legal Affairs and Risk Management	614.734.8024	<a href="mailto:lhines@medflight.com">lhines@medflight.com</a>
Safety Officer Bill Fauconneau, Safety Officer	614.734.8047	<a href="mailto:bfauconneau@medflight.com">bfauconneau@medflight.com</a>
Chief Executive Officer Tom Allenstein, President/CEO	614.734.8061	<a href="mailto:tallenstein@medflight.com">tallenstein@medflight.com</a>





**Acknowledgement and Certification**

My signature on this form acknowledges that I have received the Ohio Medical Transportation, Inc. (MedFlight) Code of Conduct or that I have been made aware that a copy of the Code of Conduct is available on the MedFlight Intranet for my review.

I understand how the Code of Conduct applies to me and agree to comply with each provision. I acknowledge that I have reviewed the reporting provisions. If I have concerns about unethical behavior, a suspected violation of the Code of Conduct, or any other law or regulations, I will report my concerns through the channels and contacts listed in this document. There also is a hotline I can call if I wish to remain anonymous.

I understand that Ohio Medical Transportation, Inc. prohibits retaliation or retribution against anyone for good-faith reporting of any concerns.

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Signature Date

---

Printed Name

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Position/Department (or Company if Vendor)





*Please return this signed copy to the Human Resources department or fax to 614.734.8091.*

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MedFlight is governed by our non-profit owner healthcare networks: OhioHealth and The Ohio State University Wexner Medical Center; with additional support from affiliate member Kettering Health Network.



Ohio Medical Transportation, Inc. 2827 W. Dublin  
Granville Rd. Columbus, Ohio 43235  
Communications Center 800.222.LIFE (5433)  
Business Office 877.633.3598 [www.medflight.com](http://www.medflight.com)

