

Island Medical House Doctor, P.C.
Compliance Program - Code of Conduct

A. Introduction

Effective July 1, 2010, Island Medical House Doctor, P.C., ("Island House Doctor") adopted a compliance program which is more fully described and contained in the Island House Doctor compliance program manual ("Compliance Manual").

Island House Doctor adopted the Compliance Program in order to embody its commitment to conducting its business in compliance with all applicable laws, rules, regulations and other directives of the federal, state and local governments, departments and agencies. An expression of this commitment is the code of conduct described herein which is applicable to all physicians, employees and agents of Island House Doctor ("Code of Conduct").

The Code of Conduct provides the guiding standards for our decisions and actions as physicians, employees and agents of Island House Doctor. Although the Code of Conduct can neither cover every situation in the daily conduct of our many varied activities nor substitute for common sense, individual judgment or personal integrity, it is the duty of every shareholder, employee and agent of Island House Doctor to adhere, without exception, to the principles set forth herein.

The Code of Conduct shall be distributed annually, and periodically as necessary, to all physicians, employees and agents who shall be responsible for ensuring that their behavior and activity is consistent with the standards embodied in this Code of Conduct.

B. Standards of Conduct

Island House Doctor, its physicians, employees and agents shall comply with all applicable federal, state and local laws, rules, regulations and standards ("laws and regulations")

It is the duty of Island House Doctor, its physicians, employees and agents to uphold all laws and regulations. All physicians, employees and agents must be aware of the legal requirements and restrictions applicable to their respective positions and duties.

While this duty remains an individual responsibility of each employee and agent, as necessary, Island House Doctor shall educate such individuals and implement programs necessary to foster further awareness of applicable laws and regulations and to monitor and promote compliance with such laws and regulations. Any questions about the legality or propriety of any actions undertaken by or on behalf of Island House Doctor should be referred immediately to the Compliance Officer.

Island House Doctor, its physicians, employees and agents shall refrain from any conduct which might be deemed to violate federal and state fraud and abuse prohibitions

Island House Doctor expects its physicians, employees and agents to refrain from any conduct which may violate applicable federal and state laws and regulations, with special emphasis on those related to fraud and/or abuse.

These laws generally prohibit: (1) the transfer of anything of value in order to induce the referral of patients or any government program business (i.e., Medicare, Medicaid and other federal or state health care programs); (2) the making of false representations or the submission of false, fraudulent or misleading claims to any government entity or third party payor, including claims for services not rendered, claims which characterize the service differently than the service actually rendered, or claims which do not otherwise comply with applicable program or contractual requirements; and (3) referring Island House Doctor business to an entity in which a shareholder, employee or agent has a financial interest.

More specific guidance with respect to laws and regulations applicable to fraud and abuse can be found in Island House Doctor's Compliance Manual.

Island House Doctor, its physicians, employees and agents shall conduct its/their affairs in accordance with the highest ethical standards

Island House Doctor , its employees and agents shall conduct all activities in accordance with the highest ethical standards of their respective professions at all times and in a manner which shall uphold Island House Doctor's reputation and standing in the community to which we serve.

Island House Doctor, its physicians, employees and agents shall secure and keep confidential all individually identifiable health information concerning Island House Doctor 's patients and all business and corporate records in accordance with applicable laws and regulations

Island House Doctor, its physicians, employees and agents, are in possession of, and have access to, a wide variety of confidential, sensitive and proprietary information, the inappropriate release of which could be injurious to individuals, Island House Doctor's business, physicians and Island House Doctor itself.

It is the duty of Island House Doctor, its physicians, employees and agents to maintain the confidentiality of patient medical records and information, as well as other confidential information by actively protecting and safeguarding confidential, sensitive and proprietary information in a manner designed to prevent the unauthorized disclosure of such information.

Physicians, employees and agents shall support Island House Doctor's goals and interests and avoid actual or perceived conflicts of interest and/or improper business arrangements

Island House Doctor's business practices must be conducted with honesty and integrity and in a manner that upholds Island House Doctor's reputation with patients, payors, vendors, competitors and the community. Island House Doctor expects its physicians, employees and agents to commit their undivided and unqualified loyalty to Island House Doctor's interests. Such individuals may not use their positions to profit personally or to assist others in profiting in any way at the expense of Island House Doctor. All physicians, employees and agents shall regulate their activities so as to avoid actual impropriety and/or the appearance of impropriety which might arise from the influence of those activities on business decisions of Island House Doctor, or from disclosure or private use of business affairs or plans of Island House Doctor.

Physicians, employees and agents involved in business transactions on behalf of Island House Doctor have a duty to ensure that such business is transacted free from offers or solicitation of gifts, favors or other improper inducements in exchange for influence or assistance in a transaction or the referral of business. If there is any doubt or concern about whether specific conduct or activities are ethical or otherwise appropriate, the doubt or concern should be referred immediately to the Compliance Officer or a member of the Management Committee.

Island House Doctor, its physicians, employees and agents shall strive to ensure the provision of proper patient care in accordance with the highest professional standards

As professionals, all physicians, employees and agents have a duty to support Island House Doctor's goals to provide medical services of the highest quality that respond to the needs of our patients. The services provided must be reasonable and necessary to the care of each patient, and such care must be provided by properly qualified individuals. All such care must be properly documented as required by law and regulation, payor requirements and professional standards.

Island House Doctor shall provide equal employment opportunity and respect the dignity of all persons with whom it maintains a business, professional or employment relationship

Island House Doctor is committed to providing equal employment opportunities for all persons, without regard to race, color, creed, religion, sexual orientation, national origin, age, sex, marital status, blindness, source of payment or sponsorship, or disability. Island House Doctor is committed to providing patient care and a workplace environment which emphasizes the dignity and respect of every individual. In that regard, harassment and/or other types of prohibited discrimination in any form or context will not be tolerated.

Island House Doctor, its physicians, employees and agents shall take great care to ensure the maintenance and proper submission of claims to all payor sources

Island House Doctor, its physicians, employees, and agents have a duty to create and keep records and documentation which conform to legal, professional and ethical standards. Such individuals shall ensure that payment or reimbursement from government reimbursement sources such as Medicare and Medicaid and private payor sources is for such care as is reasonable, necessary and appropriate, is provided by properly qualified persons, and is billed correctly and supported by adequate documentation.

All claims for reimbursement to government and to private insurance payors must reflect truth and accuracy and conform to all applicable laws and regulations. Island House Doctor, its physicians, employees and agents are prohibited from knowingly presenting or causing to be presented claims for payment or approval which are false, fictitious, fraudulent or otherwise not in compliance with applicable laws and regulations.

The Code of Conduct is integral to Island House Doctor. All its physicians, employees and agents must uphold these standards and report any actual or perceived violations by following the reporting procedures outlined in the Compliance Manual

The Code of Conduct exists for the benefit of Island House Doctor, its physicians, employees, agents, and patients. It will most likely be revised and evolve over time through the contributions of all of the aforementioned individuals. Island House Doctor expects that the Code of Conduct will be a part of the daily activities of its physicians, employees and agents. The Code of Conduct is, in addition to, and does not limit, specific policies and procedures of Island House Doctor. Physicians, employees and agents must perform their duties in accordance with all such policies and procedures.

It is the duty of every employee and agent to uphold the standards set forth in the Code of Conduct and to report violations by following the reporting procedures outlined in the Compliance Manual. Alleged violations of the Code of Conduct or other policies and procedures of Island House Doctor will be investigated by persons designated by, and pursuant to procedures established by, Island House Doctor. Island House Doctor will make efforts to maintain the confidentiality of the identity of any individual who reports perceived or actual violations. However, confidentiality of identity cannot be guaranteed.

It shall be a violation of the Code of Conduct to take any action in reprisal against anyone who reports suspected violations of the Code of Conduct or other Island House Doctor policies and procedures in good faith.

Disciplinary action for violations of the Code of Conduct and Island House Doctor policies and procedures shall be enforced through the disciplinary policies and procedures of Island House Doctor as in effect from time to time. Disciplinary actions will be determined on a case-by-case basis and may, in Island House Doctor's discretion, range from a warning to termination. If Island House Doctor determines that a violation has included criminal violations of law or regulation, Island House Doctor will cooperate with law enforcement authorities in connection with the investigation and prosecution of the offender.

How to Report a Violation of the Code

To report a violation of the Code of Conduct, you may contact the Compliance Officer. If you prefer not to report such matter to the Compliance Officer, for whatever reason, or if you prefer to report the matter anonymously, you can deposit a written report of the violation in the suggestion/comment box or mail a letter to the Compliance Officer, 88 Arkay Drive Hauppauge New York 11788.

Please note that the Code of Conduct does not create any contract or contract of employment, express or implied, between Island House Doctor and any individual. Island House Doctor will generally attempt to communicate changes to the Code of Conduct prior to the implementation of such changes. However, Island House Doctor reserves the right to modify, amend or alter the Code of Conduct and its policies and procedures without prior notice to any person.