



ESSENT HEALTHCARE, INC.

Section: Corporate Compliance	Effective Date:	11/15/04
Subject: Code of Conduct	Revision Date:	09/30/09
Policy #: CC-1	Review Date	9/30/09
Responsible Party: Corporate Compliance Officer	Revision #:	3

Scope:

This policy applies to all employees, agents and contractors of Essent Healthcare, Inc.

Purpose:

The purpose of this policy is to set forth the process for updating, maintaining and distributing the Code of Conduct. This policy also sets forth the requirements for an annual acknowledgement of the Code of Conduct.

Policy:

Essent Healthcare has developed a Code of Conduct that outlines basic ethical and compliance principals that must be followed by all workforce members. The Code of Conduct articulates Essent Healthcare's commitment to comply with all Federal and State standards, with an emphasis on ethical behavior and preventing fraud, waste and/or abuse. It is the policy of Essent Healthcare that:

- The Code of Conduct is to be reviewed by the Corporate Compliance Officer periodically (at least annually), and updated to reflect the changing needs of the organization and any applicable regulatory changes.
- The Corporate Compliance Officer will furnish each facility with copies of the most current version of the Code of Conduct.
- All employees must re-affirm the Code of Conduct, in writing, on an annual basis.
- All new employees are to be given a copy of the code of conduct at or before new employee orientation.
- A signed acknowledgement form must be obtained from each new employee before starting work and annually thereafter.

Procedure:

The Corporate Compliance Officer (CCO) has developed a Code of Conduct that must be followed by all employees, agents, and contractors of Essent Healthcare, Inc. The CCO and the compliance committee will review the Code of Conduct periodically to ensure that the Code of Conduct remains up to date, and reflects the changing needs of the organization. The CCO will ensure that each facility has the most current version of the Code of Conduct so that it can be distributed to all employees.



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On an annual basis, the Compliance Officer at each facility will be responsible for distributing the Code of Conduct and an annual acknowledgement form to every workforce member of that facility. The HR office at each facility will be responsible for retaining the signed acknowledgement forms from each employee in the employee's personnel file.

During new hire orientation, the Hospital Compliance Officer or his/her designee will distribute and discuss the Code of Conduct. Each employee will be required to review the Code of Conduct and sign an acknowledgement stating that they have read, understood, and agree to comply with the Code of Conduct. The HR department of each hospital will be responsible for maintaining documentation (signed acknowledgement forms) that each new employee has accepted the Code of Conduct prior to starting work.

The compliance committee shall notify the CCO of the need to translate the Code of Conduct into any other languages so that all employees can read and understand this document.

References:

Essent Compliance Plan Document
OIG Compliance Guidance for Hospitals
Federal Sentencing Guidelines for Organizations
Deficit Reduction Act
Medicare Part C and D (42 CFR 422.503 and 423.504)