

GREENWOOD GENETIC CENTER

Code of Conduct



Code of Conduct

Table of Contents

A Message from our Director	3	Government Audits and Investigations	9
GGC Mission and Vision	4	Anti-Kickback and Federal Stark Laws	10
GGC Culture Statement	5	Disability Accommodations	11
Business Ethics/Compliance Program	6	Equal Employment Opportunity	12
Conflicts of Interest	7	Reporting Concerns	13
Gifts and Gratuities	7	Contact Information	14
Confidentiality	8		
Accurate Documentation, Medical Necessity, Billing and Coding	9		





A Message from our Director

For nearly five decades the Greenwood Genetic Center has been committed to providing the highest quality compassionate care for the patients and families we serve through clinical services, diagnostic testing, research, and education. Along with our culture of care and compassion is a primary responsibility to serve this mission with respect and integrity.

The Greenwood Genetic Center's Code of Conduct, set forth in the following pages, includes our standards for behavior and expectations of compliance across all Greenwood Genetic Center offices and divisions. Each employee has a responsibility to themselves, and to this organization to ensure that their conduct is reflective of the Center's culture of integrity.

The policies included in our Code of Conduct help to guide our everyday decisions and behavior in a way that maintains both legal compliance and personal integrity. All employees are expected to follow these policies and have the responsibility to ask questions when something is unclear or speak up when any behavior is observed that is in conflict with this code.

Our compliance program and this Code have been put into place to formalize and solidify what we have known for years – that GGC's commitment to patient care and adherence to ethical business practices are at the very core of who we are as an organization.

I am proud to be associated with this outstanding team where each of my dedicated colleagues is committed to providing quality patient care and maintaining the high standards of conduct that has come to be expected of the Greenwood Genetic Center.

A handwritten signature in white ink, appearing to read "S. Skinner", written over a dark green background.

Steve Skinner, MD





Our Mission

The Greenwood Genetic Center is a nonprofit institute organized to provide clinical genetic services, diagnostic laboratory testing, educational programs and resources and research in the field of medical genetics

Our Vision

The Greenwood Genetic Center will be a Center of Excellence in Medical Genetics, serving as a resource for all persons who need genetic services or information, and working to reduce the prevalence and impact of genetic disorders.



Our Culture

The following attributes reflect the overarching ideals that the Greenwood Genetic Center (GGC) and its employees strive to embody in every encounter and every professional duty. This is meant to be an exhaustive list of GGC attributes, but to highlight those that are at our core – those we do not compromise and those that guide us as we live out on mission.

Care & Compassion



Our first priority as an organization is to provide compassionate care to the patients and families we serve. Care and compassion are at the core of our organization's very existence. With persistence, and to the best of our abilities, we ensure that the needs of our patients are met. Our drive to excel is fueled by the desire to improve the health and lives of our patients and their families and the well-being of our employees.

Respect & Integrity



We act with integrity and honesty in everything we do. We treat each other with respect and value the contributions of all members of the GGC team. All patients, providers, educators, and students are treated with that same respect. We are professionals who are committed to working as a team in the best interest of those we serve.

Quality in Service



We are here to improve the lives of others. We strive to maintain the highest quality in genetic medicine, research, and education to meet the needs and exceed the expectations of those we serve. We are always open to methods of improving the services we offer, and welcome collaboration and sharing of information for the good of those we serve. We are driven to innovate and advance genetic technologies and provide patients with access to the highest-quality services.



Business Ethics and Compliance Program

The successful business operation and reputation of GGC is built upon the principles of fair dealing and ethical conduct of our employees. Our reputation for integrity and excellence requires careful observance of the spirit and letter of all applicable laws and regulations, as well as a scrupulous regard for the highest standards of conduct and personal integrity. The continued success of GGC is dependent upon our patients' trust and we are dedicated to preserving that trust. Employees owe a duty to GGC and its patients to act in a way that will merit the continued trust and confidence of the public.

The Greenwood Genetic Center has implemented a Compliance Program to ensure that our business is run ethically and in conformance to all applicable state and federal laws and regulations and with the Greenwood Genetic Center's policies and procedures. The GGC Compliance Officer and the GGC Compliance Committee oversee the GGC's commitment to maintaining high ethical standards and legal compliance in patient care and business relationships. The Greenwood Genetic Center expects every member of its workforce and its Board of Directors to have a strong familiarity with the Compliance Program and to uphold its principles and standards. It is important to GGC patients, staff, and business associates to know that GGC is committed to the development and reinforcement of a culture of compliance at Greenwood Genetic Center.

Conflict of Interests

Employees have an obligation to conduct business within guidelines that prohibit actual or potential conflicts of interest. An actual or potential conflict of interest occurs when an employee is in a position to influence a decision that may result in a personal gain for that employee or for a relative as a result of GGC's business dealings.

No "presumption of guilt" is created by the mere existence of a relationship with outside firms. However, if employees have any influence on transactions involving purchases, contracts, or leases, it is imperative that they disclose the existence of any actual or potential conflict of interest so that safeguards can be established to protect all parties.



Gifts and Gratuities

Certain gifts and gratuities in the healthcare setting may violate federal and state laws and GGC adheres to all legal requirements while reserving the right to establish GGC policies that might go beyond legal requirements. GGC employees will only accept or offer gifts, gratuities, and business courtesies of nominal value and in full compliance with all applicable laws and GGC policies. No gifts or items of value of any kind may be solicited from patients, caregivers, vendors, or contractors. Vendors offering gifts above nominal value should be referred to the GGC Foundation. Business courtesies should not be accepted, offered, or provided as an inducement to reward a business or refer patients.



Confidentiality

As a covered entity, the Greenwood Genetic Center complies with the Privacy and Security Rules set forth in the Health Insurance Portability and Accountability Act of 1996 (HIPAA), the Health Information Technology for Economic and Clinical Health (HITECH) Act, enacted as part of the American Recovery and Reinvestment Act of 2009; and the HIPAA Omnibus Final Rule enacted in 2013 as overseen by the Greenwood Genetic Center's Privacy Officer.

All of the Greenwood Genetic Center workforce is subject to HIPAA regulations and work to provide security and confidentiality to all protected health information (PHI). Disclosure of PHI only occurs when directed by appropriately-vetted authorizations, for treatment, payment, or healthcare operations, or in other circumstances as required by law.

Breaches of PHI are investigated and reported in accordance with HIPAA regulations.

Patients are provided with access to the Greenwood Genetic Center's 'Notice of Privacy Practices' at or before their initial visit. Procedures are in place to comply with all specified patient rights.

The Greenwood Genetic Center maintains policies and procedures necessary to ensure compliance with HIPAA. Such policies and procedures are part of new employee onboarding and ongoing employee training curricula.

Accurate Documentation, Medical Necessity, and Coding and Billing

Members of the Greenwood Genetic Center workforce involved in the coding and billing process will receive appropriate training and education upon hire and annually regarding the appropriate coding, billing, and documentation of services and items.

Services will not be billed to a patient or third-party payor by a member of the Greenwood Genetic Center workforce unless performed by an appropriate provider at Greenwood Genetic Center in accordance with the state's scope of practice laws and the applicable payor policies.

No services will be billed to a patient or third-party payor by a member of the Greenwood Genetic Center workforce unless appropriate documentation exists in the patient medical record to support the medical necessity of the services and/or items.



Government Audits and Investigations

In recent years, federal and state governments have made the investigation of healthcare fraud, waste, and abuse a top priority. It is GGC's policy to provide full cooperation to governmental agencies conducting investigations. At the same time, GGC is committed to protecting the rights of GGC and its employees.

If an employee is contacted by a federal or state agency or receives notice of a federal or state investigation or audit, the employee will forward the notice to the GGC Billing Coordinator, Chief Operating Officer, or Compliance Officer.



Anti-Kickback Statute and Federal Stark Laws

As Healthcare providers, GGC is subject to a variety of federal and state laws that prohibit fraud, waste, and abuse. Following both federal and state anti-kickbacks statutes, Greenwood Genetic Center and its employees will not solicit, receive, offer, or pay anything of value to induce referrals for services that might be submitted for reimbursement by any federal or state health care program including Medicare, Medicaid, Tricare, commercial insurance, or any other payor. Additionally, Greenwood Genetic Center prohibits providers from referring patients to other entities for designated health services in which the provider or their family members have a financial interest. There are exceptions to these statutes and if the GGC employee has questions, the employee should contact the GGC Compliance Officer, the GGC Billing Coordinator, or the GGC Chief Operating Officer. GGC is committed to following all federal and state statutes.

GGC maintains a Whistleblower Policy which reflects GGC's commitment to adhere to the Deficit Reduction Act of 2005. GGC requires all employees observe high standards of business and personal ethics in the conduct of their duties and responsibilities. As representatives of GGC, we must practice honesty and integrity in fulfilling our responsibilities and comply with all applicable laws and regulations.

Reporting Responsibility

The Whistleblower Policy is intended to encourage and enable GGC employees to raise concerns internally so that GGC can address and correct inappropriate conduct and actions.

Confidentiality/Retaliation

Whistleblower protections are provided in two areas – confidentiality and against retaliation. If possible, the confidentiality of the whistleblower will be maintained. However, the identity may have to be disclosed to conduct a thorough investigation, to comply with the law and to provide accused individuals their legal rights of defense.

Disability Accommodations

GGC is committed to complying fully with the Americans with Disabilities Act (ADA) and ensuring equal opportunity in employment for qualified persons with disabilities. All employment practices and activities are conducted on a non-discriminatory basis. Hiring procedures have been reviewed and provide persons with disabilities meaningful employment opportunities. Pre-employment inquiries are made only regarding an applicant's ability to perform the duties of the position. Reasonable accommodation is available to all disabled employees, where their disability affects the performance of essential job functions.

All employment decisions are based on the merits of the situation in accordance with defined criteria, not the disability of the individual. Qualified individuals with disabilities are entitled to equal pay and other forms of compensation (or changes in compensation) as well as in job assignments, classifications, organizational structures, position descriptions, lines of progression, and seniority lists. Leave of all types will be available to all employees on an equal basis.

GGC is also committed to not discriminating against any qualified employees or applicants because they are related to or associated with a person with a disability. GGC will follow any state or local law that provides individuals with disabilities greater protection than the ADA.



Equal Employment Opportunity

In order to provide equal employment and advancement opportunities to all individuals, employment decisions at GGC will be based on merit, qualifications, and abilities. GGC does not discriminate in employment opportunities or practices on the basis of race, color, religion, sex (including gender identity, sexual orientation, and pregnancy), national origin, age, disability, genetic information, military status, or any other characteristic protected by law. GGC will make reasonable accommodations for qualified individuals with known disabilities unless doing so would result in an undue hardship on the Greenwood Genetic Center.

Any employees with questions or concerns about any type of discrimination in the workplace are encouraged to bring these issues to the attention of their immediate supervisor or the Human Resources Department. Employees can raise concerns and make reports without fear of reprisal. Anyone found to be engaging in any type of unlawful discrimination will be subject to disciplinary action, up to and including termination of employment.



Reporting Concerns

Greenwood Genetic Center has established procedures for members of the Greenwood Genetic Center workforce to utilize in reporting concerns or suspected violations of applicable state and federal laws and regulations, Greenwood Genetic Center's policies and procedures, and/or the Greenwood Genetic Center Code of Conduct. Members of the Greenwood Genetic Center workforce are expected to promptly report concerns or suspected violations. Employees who report concerns or suspected violations in good faith will not be subject to retaliation.

Ways to report concerns:

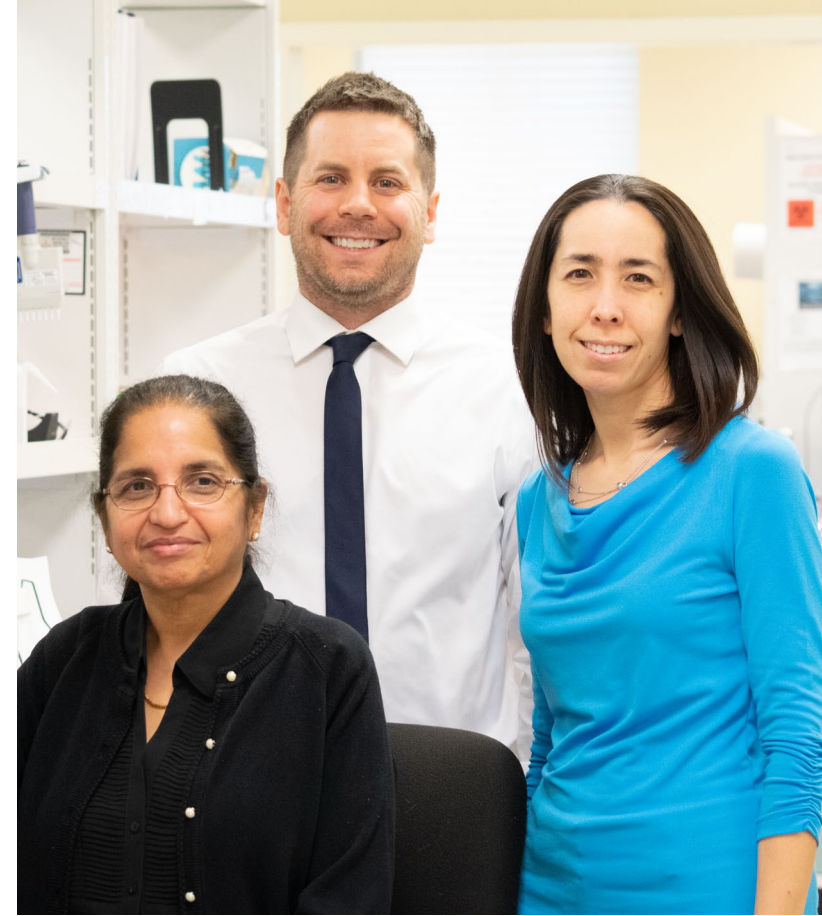
To ask a compliance question or to report a suspected violation, members of the Greenwood Genetic Center workforce should contact the member's immediate Supervisor, Human Resources, a member of management, a member of GGC administration, or use the Greenwood Genetic Center Compliance Hotline.

Any member of the GGC workforce may call the Compliance Hotline at 1-844-961-4317.

The Compliance Hotline is also available on-line at: <http://greenwoodgeneticcenter.ethicspoint.com/>, through a link on Greenwood Genetic Center's SharePoint Compliance page and via mobile phone through the QR Code below.

Hotline calls and reports are answered 24 hours per day, 7 days per week. The employee is not required to furnish a name and the call will not be recorded, traced, or identified. Any information provided by the employee during the call will be treated as confidential.

GGC is committed to open communication and may monitor/audit the submissions to help identify potential areas of unethical behaviors or activities.



Contact Us

Greenwood Genetic Center
101 Gregor Mendel Circle
Greenwood, SC 29646

1-888-442-4363

www.GGC.org

Compliance Officer: Paul Pridmore ppridmore@ggc.org
HIPAA Privacy Officer: Lori Bassett, MS, CGC lbassett@ggc.org

