



MID-MICHIGAN PHYSICIANS, P.C.

CODE OF CONDUCT

Welcome to Mid-Michigan Physicians. MMP is a multi-specialty group of physicians who practice in the area surrounding Lansing. Founded in 1995, we are proud of the success we have had in serving patients in our communities. Part of the reason for this success is that we have operated MMP at the highest levels of ethical conduct. We believe that such conduct must continue, both because it is the right thing to do and because the laws of our state and nation require such conduct.

MMP has a Compliance Program. MMP employees and independent contractors have an obligation to become familiar with this Program and to certify that they have read and understand the MMP Code of Conduct and the MMP Compliance Program. Any such employee or contractor who does not understand any provision of the MMP Code of Conduct or the MMP Compliance Program shall seek clarification from the MMP Compliance Officer about such provision.

Please read the straight-forward rules of conduct set forth below, which apply to all our employees and independent contractors, and which govern our relationships with patients, vendors and the public and private organizations that reimburse MMP for the care we provide.

1. We are a patient-focused organization. Patients are our reason for being. They will be treated respectfully at all times and our services must always be provided in a way that meets their needs and desires.
2. Staff must never discuss a patient within hearing distance of another patient.
3. Personal conversations between or among staff members and employees must occur outside of patients' hearing, so that patients have no reason to conclude that they are not our first priority.
4. Each employee and independent contractor of MMP is asked to sign a Confidentiality Agreement. This is designed, among other things, to protect the confidential nature of all information about our patients. The Confidentiality Agreement will be followed at all times.
5. MMP expects all employees and independent contractors to conduct business according to the highest ethical standards. All are to devote their efforts to the interests of MMP. Conflicts of interest and potential conflicts of interest between the private interests of employees and independent contractors and MMP's interests must be disclosed to appropriate officials of MMP and no employee or independent contractor can take action of any kind where that employee or independent contractor has a conflict of interest or the appearance of a conflict of interest. These issues are discussed more fully in MMP's Personnel Policy Manual.

6. Most of the work of MMP physicians, physician assistants and nurse practitioners is reimbursed by “third party payors,” governmental and private insurance plans. MMP expects all providers to comply strictly with all requirements imposed by these third party payors.
7. Except as allowed by the AMA Code of Ethics or the PhRMA Code, MMP physicians may not offer or accept anything of value in any form whatsoever in return for or to induce the referral of business which will be billed to the Medicare or Medicaid programs.
8. MMP providers must at all times comply with the requirements of the Ethics in Patient Referral Act, also known as the “Stark law.”
9. MMP expects its employees and independent contractors who become aware of any violation of this Code of Conduct to inform the appropriate personnel of MMP about such suspected violation, either directly or using the confidential mechanism established by MMP for such reports.
10. MMP insists that no employee or independent contractor retaliate in any way against anyone who makes a report of any suspected violation by another of the Code of Conduct.
11. MMP employees and independent contractors will be provided from time-to-time with educational resources and training about aspects of the Compliance Program and this Code of Conduct. Each such employee and independent contractor is expected to read written materials provided relevant to his or her job, and to attend educational courses which MMP leadership directs that he or she attend.
12. The MMP Compliance Officer and Compliance Committee have been given the authority to investigate reports of suspected violations of the Compliance Program. MMP expects each employee and independent contractor to cooperate in any investigation in which he or she is asked to participate.
13. MMP employees and independent contractors provide care without regard to race, religion, national origin, age, sex, disability or any other factor prohibited by law.
14. MMP, its employees and its independent contractors shall not obstruct law enforcement officers carrying out their duties consistent with the authority granted to them pursuant to a search warrant which appears to be properly issued.

Disciplinary action may result from conduct not consistent with the principles of the Code of Conduct.

The Code of Conduct will be reviewed, updated and distributed periodically. It will also be available in its then-current form on the MMP website.