1. **Act with Integrity and in Compliance with Our Staff Standards of Conduct, GRHC Policies and Procedures, and with Laws and Regulations Applicable to GRHC.**

2. **Cooperate and Participate.** GRHC staff are expected to cooperate and participate as requested with Compliance investigations, audits, surveys, risk assessments and training.

3. **Treat Each Other with Dignity, Fairness and Foster a Safe and Productive Workplace.**

4. **Only Engage in Permitted Activities.** Staff are only permitted to do their job or functions as indicated in GRHC job descriptions, contracts, policies, and other work-related instructions and agreements.

5. **Protect Information and Assets at GRHC.**

6. **Follow Ethical Business and Healthcare Practices** including GRHC staff standards of conduct, regulations, those of applicable professional licensing or certification organizations, and GRHC policies.

7. **Be Accurate and Timely** with information and communication about patients, staff and the GRHC organization (including charting, coding, billing, finances, specimen labeling, pharmaceutical dispensing, data reporting, etc.).

8. **Avoid Bribery, Kickbacks, Corruption and Conflicts of Interest** when hiring employees, awarding contracts, making patient referrals, etc.

9. **No Snooping or Gossiping.** Only access patient information to do your job. Managers cannot access patient information about their staff. Do not share pictures or information about patients verbally, in writing, electronically, etc. except to do your job.

10. **Use Approved Messaging.** Communication about GRHC (patients, staff, organization) with the public must be pre-approved by Leadership and/or the Board. Only share or discuss negative opinions about staff or patients privately with GRHC management, HR or the Compliance team.

11. **Accurate Documents, Authentic Signatures.** All GRHC records and reports must contain accurate information; document signatures must be authentic.

12. **Only Providers Determine Medical Necessity.** Diagnosis codes and the selection of tests for patients must be made by the ordering provider.

13. **Ask Questions, Seek Guidance, Raise Concerns** about risks, safety and compliance at GRHC.

14. **Non-Retaliation, Confidentiality, Anonymity.** GRHC reports about compliance issues will be protected.

15. **Authority and Autonomy for Compliance** is designated by the CEO and Board of Directors to the Compliance Officer.
All of our staff at Gila River Health Care (GRHC) are dedicated to providing superior health and wellness services in a respectful and ethical manner for the Gila River Community and the other people who request our care. The staff at GRHC includes not only our employees, but also all of our consultants, contracted clinicians and vendors, temporary workers, students and volunteers.

We strive to maximize the effectiveness of our programs and services through our adherence to 1) these rules for staff conduct, 2) applicable laws and regulations, and 3) GRHC policies with their accompanying procedures. The GRHC Compliance Officer and her department team oversees this adherence. They serve as a resource and partner to our GRHC departments and staff, to help us stay compliant. Also, a cross-section of GRHC staff actively serve on the Compliance Committee, to guide and promote the compliance program at GRHC.

Gila River Health Care staff are expected to conduct themselves according to:
- Our staff standards of conduct
- Our GRHC policies and procedures
- Applicable laws and regulations

Along with the Compliance Committee, the GRHC Compliance Department identifies ways to enhance communication, training and management at GRHC to help steer the staff to do the right things. The Compliance Department helps protect GRHC patients and staff by conducting risk assessments, monitoring, investigating reports of possible wrong doing, etc. Due to its importance at GRHC, staff compliance is a consideration in awarding merit increases and renewing contracts; failure to comply can result in disciplinary action or employment/contract termination.

Any staff member who has questions about compliance or needs to report a compliance issue can contact:

Compliance Officer:  Ms. Jule Drown (602) 528-1493  
Compliance Department team email: compliance@grhc.org

The GRHC Compliance Hotline (can remain anonymous):  
(866) 601-2967 or submit hotline form from the GRHC intranet