

Code of Conduct



CARSON TAHOE
Regional Healthcare



Dear Carson Tahoe Colleague,

As you are all aware, the mission of Carson Tahoe Regional Healthcare is to enhance the well being of the communities we serve. Our compassion is demonstrated by the delivery of personalized patient care by our exceptional and dedicated healthcare team. In delivering that care, our primary focus is to enhance each patient's quality of life.

Our integrity is demonstrated by our unwavering commitment to ethical and legal business practices in all that we do. To that end, we strive to comply with all relevant legal and contractual requirements, accreditation, industry standards, and our own internal policies and procedures, as well as ethical business principles of honesty, good faith, and fair dealing. In today's healthcare environment, it is important

that we continually seek additional ways to demonstrate this commitment and to provide practical guidance to our colleagues regarding their obligations to assist us in such efforts. Such colleagues include Carson Tahoe employees and others with whom we work closely to provide quality healthcare services to patients.

To further demonstrate Carson Tahoe Regional Healthcare's commitment to compliance, the Board of Hospital Trustees adopted a formal, expanded, comprehensive Compliance Program. A key component of the program is the code of conduct. The code provides guidance in carrying out our duties within appropriate ethical and legal standards. These obligations apply to our relationships with patients, providers, payers, regulators, vendors, contractors, business partners, and one another.

The code has full support of Administration and the Board of Hospital Trustees. The Code has been developed to ensure that we all know and understand what is expected from us and what we might reasonably expect from those with whom we interact in the carrying out of our responsibilities. The policies set forth in the code are mandatory and must be followed by everyone.

If you have any questions, please feel free to contact you supervisor, manager, director, CTRH Administration, the Corporate Compliance Officer, or a member of the Compliance Oversight Committee.

Sincerely,

Ed Epperson, President & CEO, Carson Tahoe Regional Healthcare

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Adhering to the **highest ethical** standards.

At Carson Tahoe Regional Healthcare, the health of our patients is our priority. Our dedicated staff, volunteers and physicians strive to be the best healthcare system we can be.

That's why we treat our healthcare system in the same manner we treat our patients – with care, respect and a commitment to do our very best. It's what motivates us every single day, and it's what separates us from other health systems. By adhering to our Code of Conducts, you can join in the effort to create a positive, healing environment.

Our Mission:

To enhance the health and well-being of the communities we serve

Our Core Values:

Putting Patients First

Treating Everyone with Dignity and Respect



Professional Performance Standards:

Carson Tahoe Regional Healthcare is committed to continually improving patient satisfaction. Our patients and their families deserve outstanding care, and we realize that we must deliver that care with compassion, teamwork, respect and honesty. This statement of Professional Performance Standards identifies the qualities and behaviors we expect our employees to demonstrate in all interactions with patients, families and with each other.

Compassionate Care & Communication –

Exceed expectations and anticipate the needs of patients while enhancing the quality of care and the quality of the work environment.

Listen carefully to the needs of others, be patient and tolerant in responding to those needs and demonstrate a willingness to go the extra mile when providing service.

Greet all patients, family members and visitors in a warm and friendly manner by introducing oneself with full name, department represented and purpose for contact. Make eye contact and smile when talking with patients, visitors and family members. Keep patient and families informed about time delays. Thank the person for waiting, apologize for the delay and then follow up to resolve the issue.

Regularly inform patients and family, if appropriate, regarding their treatment and healing processes.

Address special needs of patients (i.e. interpreters for non-English speaking patients, amplification devices and closed-captioned television for the hearing impaired).

Be responsible to resolve any concerns. Express empathy and understanding and follow up with comments such as:

“How can I resolve this for you?”

“Thank you for bringing this to my attention.”

“What can I do to make it better?”

“I’ll take care of this for you now.”

“I’m sorry this has happened.”

Teamwork — Unselfishly work with others toward common goals and visions.

- Participate in combined efforts to exceed what can be accomplished individually by willingly making contributions to special projects and team efforts.
- Conduct oneself as a professional and treat every colleague as a professional. Recognize that we each have an area of expertise.
- Collaborate with multidisciplinary team members to coordinate the best care for the patient.
- Welcome new employees and be supportive by offering help and setting an example of the cooperation expected in the workplace.
- Take ownership of any problem by handling those issues that you can, and taking responsibility for contacting the appropriate persons for concerns that you cannot resolve. Remain involved and follow up with the patient to ensure that the issue is resolved.
- Pick up immediately after oneself, pick up litter and dispose of it properly. Keep departments, patient rooms and hallways clean and uncluttered, and not block fire exits.
- Return equipment to its proper place, clean and in working order, taking care to not damage walls or doors. Contact Engineering for assistance in major repairs.
- Clean minor spills immediately, and for major spills contact Environmental Services.
- Respect all person's beliefs (including alternative modes of treatment and healing), ideas and contributions in a supportive manner.

Respect — Consistently treat patients, families and coworkers with patience, consideration and dignity.

- Value fellow employees, respect their diversity and set aside differences when working together.
- Do not blame, chastise, embarrass or discipline fellow employees in the presence of others.
- Speak to patients and families in private regarding their care. Close doors and curtains and knock before entering a patient's room.
- Respond to all call lights as soon as possible and follow up with appropriate personnel if not able to provide the services requested.
- Be observant and offer to assist/escort anyone who appears to need direction.
- Take the first steps in providing service without being asked by anticipating, identifying and resolving concerns.
- Care for the patient as you would like to be treated.
- Provide a calm, healing atmosphere by keeping noise levels down, offering assistance (e.g., turning lights and TV off), closing patient room doors and being aware of voice level.
- Use easily understood and appropriate language when giving patients information about health, special diets, tests, procedures, medications, etc.
- Reinforce verbal instructions with teaching sheets or other written material whenever possible.

Honesty & Integrity – Commit to truthful and open conduct in all aspects of work and workplace relationships.

- Provide superior service by working in a self-directed manner, completing job duties and tasks right the first time, and taking initiative to follow through until service is completed.
- Perform duties in a safe, ethical and honest manner.
- Promptly and appropriately address any potential violations of our standards for conduct, policies and procedures.
- Maintain confidentiality of patient and coworker problems and concerns.
- Never discuss private or healthcare information or hospital business in public areas such as elevators, cafeteria or waiting rooms.

Please sign and return the employee acknowledgement card located in the center of this booklet. This shows that you understand the importance of the Code of Conduct in ensuring excellence in patient care and service. Your signature ensures that you agree to abide by the Code of Conduct when upholding your responsibilities as an employee, volunteer, or physician of Carson Tahoe Regional Healthcare.

Compliance Hotline (866) 680-7961 English
 (800) 297-8592 Spanish

Purpose of the Code of Conduct

Carson Tahoe Regional Healthcare (Carson Tahoe) has adopted a Compliance Program to demonstrate our commitment to ethical and legal business practices and to ensure service of the highest level of integrity and concern. This Code of Conduct is an important component of the Compliance Program. It provides guidance in carrying out our duties within appropriate ethical and legal standards. These obligations apply to our relationships with patients, providers, payers, regulators, vendors, contractors, business partners, and one another.



We have developed this Code of Conduct to ensure that we all know and understand what is expected from us and what we might reasonably expect from those with whom we interact as we carry out our responsibilities. This Code of Conduct is intended to be comprehensive and easily understood. In some instances, it deals fully with the subject covered. In many cases, however, the subject discussed is so complex that additional guidance is necessary. Depending upon the specific subject, such guidance may be found in the Employee Handbook and other Carson Tahoe policies and procedures.

The policies set forth in this Code of Conduct are mandatory.

Violation of these policies and standards will result in disciplinary actions, up to and including termination.

Leadership responsibilities

Although all of us at Carson Tahoe are expected to follow this Code of Conduct, our leaders have both the opportunity and the responsibility to set the example, to model appropriate ethical and legal behavior. They must ensure that those on their team have ready access to sufficient information and adequate resources to comply with legal and contractual requirements, accreditation and industry standards, corporate policies and procedures, and ethical business practices. They must also encourage open communication, even when comments are critical, including the asking of questions or the raising of concerns if something does not seem right. Above all, they must send a clear, consistent message, in word and deed, supporting our commitment to doing what is right in every situation. They will follow the organizations' direction of conflict resolution by modeling the practice of "two times and up".

Reporting Options:

Chain of command

Compliance Oversight Committee Members:

V.P. Patient Care Services	V.P. Human Resources & Support Svcs.
Legal Counsel	Director, Patient Financial Services
Director, Lab & Clinical Services	Controller
Director, Quality Outcomes	
Manager, Health Info. Mgmt.	

Corporate Compliance Officer 445-8776

Anonymous Reporting Processes:

- Compliance Hotline (866) 680-7961 English
(800) 297-8592 Spanish
- Intranet e-mail reporting located under the heading of Compliance

Quality of Care and Service

- We are committed to providing our patients with access to quality health care and related services.

- With respect to service in general, we will:

Treat all those with whom we do business with courtesy and respect.

Perform all business functions in accordance with legal and contractual requirements, accreditation and industry standards, corporate policies and procedures and ethical business practices.

Audit and monitor quality of care and service, investigate potential quality issues, and take such corrective action as may be necessary and appropriate.

- With respect to health care services, we will:

Provide all of our patients with access to quality health care and related services, making no distinction in provision or quality of services based on race, color, religion, national origin, sexual orientation, or ability to pay.

Develop and implement provider credentialing and re-credentialing policies and procedures that comply with various regulatory, accrediting and other industry standards, and our own Medical Staff Bylaws and Regulations.

Develop and implement policies and procedures relating to quality control, including prospective, concurrent and retrospective review, continuity/transition of care, and discharge planning. Such policies will include the review of appropriate medical records, utilization patterns, and accepted practice guidelines.

Ensure that neither the terms of our payer and provider contracts nor our practices interfere with our obligation to screen and provide stabilizing treatment to patients presenting at any of our emergency facilities under the federal antidumping statute.

Develop and implement policies and procedures for complaints and appeals (from patients, providers, and employees), along with a tracking mechanism to identify specific and general problem areas, which can then be addressed.

Confidentiality

We are committed to protecting the confidentiality of personal & proprietary information relating to patients, employees & Carson Tahoe. This is information in which the party involved has a legal right to, or other reasonable expectation of, privacy.

- With respect to patients, we will:

Protect the confidentiality of patient information, including information about medical conditions, history, medication, and family illnesses and other financial and personal information.

Implement & maintain appropriate security to ensure the confidentiality & privacy of electronically stored and transmitted internal and external health care information.

Release such information only to persons authorized by law or by the patient's written consent to receive it, and then only to the extent necessary for that person to perform his or her job.

- With respect to employees, we will:

Protect the confidentiality of personal and work-related information in which employees have a reasonable expectation of privacy.

Release such information only to persons authorized by law or by the employee's written consent to receive it, and then only to the extent necessary for that person to perform his or her job.

- With respect to proprietary information, we will:

Protect the confidentiality of certain information about Carson Tahoe, its strategies and operations, which is a valuable asset to Carson Tahoe. Such proprietary information includes, but is not limited to: trade secrets, personnel data, patient lists and medical information, pricing and cost data, financial data, strategic plans, marketing strategies, and supplier, provider, and other contractor information.

Although employees may use such information to perform their jobs, it must not be shared with others outside Carson Tahoe, except as, and to the extent, required by applicable law or upon approval by the Chief Executive Officer of Carson Tahoe and/or the Board of Trustees.

Conflicts of Interest

We are committed to avoiding actual and potential conflicts of interest. A conflict of interest is any circumstance that interferes with our ability to do what is in the best interest of Carson Tahoe. The following are examples of actual or potential conflicts of interest:

Permitting an outside business interest to interfere in the performance of our job responsibilities at Carson Tahoe (e.g., soliciting business for a sideline business during our working hours at Carson Tahoe).

Accepting gifts (other than those nominal in amount) from vendors with whom Carson Tahoe does business when we are in a position to influence the vendor selection decision.

Doing business, on behalf of Carson Tahoe, with family members or close personal friends or business associates.

Hiring or supervising family members or close personal friends or business associates.

Working for, or otherwise sharing proprietary information of Carson Tahoe with, competitors of Carson Tahoe.

- To avoid actual or potential conflicts in interest, we will:

Refrain from engaging in any actions that might interfere with our ability to do what is best for Carson Tahoe.

Disclose actual or potential conflicts of interest to our supervisors, preferably before they arise, but in any event, disclose them. With careful advance planning a conflict of interest can often be avoided by providing sufficient safeguards or restructuring the situation.

If we are a Board member, officer, or key staff, disclose all existing or potential conflicts of interest to the Compliance Officer on an annual basis, at a minimum, and more frequently in the event that an actual conflict arises in the interim. Key staff are those individuals able to direct and significantly influence the affairs of Carson Tahoe.

Marketing Practices

We are committed to fair and honest competition. Our marketing practices will reflect that commitment.

- To that end, we will:

Present only truthful, fully informative, and non-deceptive information and otherwise comply with applicable related regulatory and contractual requirements in our marketing and advertising activities.



Refrain from disparaging, demeaning, or caricaturing competitors or patients or exploiting patient fears as a key motivating factor.

Assure that all marketing materials reflect services available and the actual level of licensure and certification.

Take appropriate steps to ensure that marketing personnel present clear, complete and accurate information to patients, potential patients, and the community in general.

Data Development & Submission Processes

We are committed to assuring the integrity of our data development and submission processes and the underlying data itself.

- To that end, we will:

Develop and implement policies and procedures to assure the accuracy, adequacy, and security of our data development and submission processes, as well as the underlying data itself, including effective systems for:

Receiving and processing admission information, including verification of third-party payer liability;

Communication of such information to providers, payers and relevant government agencies, as appropriate;

Timely, accurate, and complete documentation of diagnoses, treatment, services rendered, etc., in the medical record and transmission of such information to Medical Records, Patient Accounting, and other departments and personnel within the healthcare system;

Submission of accurate, non-duplicative claims for reimbursement of rendered services to the applicable payer (e.g., insurer, HMO, government program, patient); and

Preparation and reporting of accurate, relevant data in cost reports and credit balances.

- With respect to cost reports, ensure that:

Costs are not claimed unless based on appropriate and accurate documentation;

Allocations of costs to various cost centers are accurately made and supportable by verifiable and auditable data;

Disallowed costs are not claimed for reimbursement;

Accounts containing both allowable and unallowable costs are analyzed to determine the unallowable amount that should not be claimed for reimbursement;

Costs are properly classified;

Fiscal intermediary prior year audit adjustments are implemented and either are not claimed for reimbursement or claimed for reimbursement and clearly identified as protested amounts on the cost report;

All related parties are identified on Form 339 submitted with the cost report and all related party charges are reduced to cost;



Requests for exceptions to TEFRA limits and the Routine Cost Limits are properly documented and supported by verifiable and auditable data;

The procedures for reporting of bad debts are in accordance with federal statutes, regulations, guidelines and policies; and

Submission of accurate, non-duplicative claims for reimbursement of rendered services to the applicable payer (e.g., insurer, HMO, government program, patient); and

Procedures are in place and documented for notifying promptly the Medicare fiscal intermediary (or other applicable payer) of errors discovered after the submission of the cost report.

With respect to credit balances, institute procedures to provide for the timely and accurate reporting of Medicare and other federal health care program credit balances, including:



Designating at least one person as having the responsibility for the tracking, recording, and reporting of credit balances; and

Instituting additional checks and balances as a safeguard (e.g., review of reports of credit balances and reimbursements or adjustments on a periodic basis by an individual from another department).

Provider Relationships

We are committed to developing and maintaining fair, mutually respectful, and professional relationships with physicians and other health care providers, including our Medical Staff. Such relationships are not only for our mutual benefit, but for the benefit of our patients and the communities which we serve.

- To that end, we will:

Be truthful and informative in our dealings with providers, taking care to assure that they understand the terms of our relationship, including the health care and related services to be provided and the financial consequences for the provision of such services.

Be fair and equitable in the administration of our credentialing, re-credentialing, and other selection and quality assurance policies and procedures.

Avoid any potential for violations of anti-kickback and/or self-referral restrictions under applicable federal and state law and take appropriate action where necessary to detect, correct, and prevent such violations. Such restrictions are aimed at discouraging over utilization, which can cause potential harm to members, as well as to payers, including Medicare and Medicaid.

Develop and implement policies and procedures that prohibit interference with health care professionals' advice to patients, including advice regarding:

The patient's health status, medical care, and treatment options;

The risks, benefits, and consequences of treatment or non-treatment; and

The opportunity for the individual to refuse treatment and to express preferences about future treatment options.

In the event and to the extent that we utilize physician incentive plans (PIPs) in our payment arrangements with physicians or physician groups, comply with all applicable regulations, and in any event, refrain from any practices that might induce providers to withhold medically necessary care or to engage in activity that might be anti-competitive.

To the extent appropriate, accurately document provider relationships in contracts that meet all applicable legal and other compliance requirements and require that such providers (and any subcontractors) meet all such requirements, as well.

Amend and update such contracts as necessary and appropriate and enforce them in a fair, consistent, and accurate manner.

Fraud and Abuse

We are committed to complying with all applicable federal and state laws, regulations and program requirements relating to fraud and abuse in health care, including Medicare, Medicaid, and other government health care programs.

- To that end, we will take reasonable steps to:

Inform our employees, patients, and providers of applicable legal requirements and, where appropriate, indications of fraud and abuse;

Protect our employees, patients, and providers from retaliation or retribution when good faith reports are made about possible fraud and abuse;

Establish procedures and safeguards to protect against and detect actions and practices that raise potential fraud and abuse issues;

Fully investigate potential issues and take appropriate corrective action; and

Make proper disclosures to criminal and civil law enforcement authorities, government agencies or other third parties, where necessary or prudent.

- **Maintain business practices which assure that:**

Services are provided to patients in accordance with accepted medical practice;

Patients are informed regarding their financial liability, where possible;

Claims are submitted in accordance with applicable legal, program and contractual requirements, including requisite documentation and authorization;

Relationships with providers are structured so as to avoid anti-kickback and self-referral restrictions, violations of the PIP rules and over and underutilization of services; and

Financial and other information provided to patients, providers, government programs and other third parties is accurate and complete.

Neither employ nor contract with individuals/entities who have been convicted of a criminal offense related to health care or who are listed by a federal agency as debarred, excluded or otherwise ineligible for participation in federal or state health care programs.

If such criminal charges or proposed debarment or exclusion are pending, such individuals/entities will be removed from direct responsibility relating to such health care programs. If conviction, debarment or exclusion occurs, we will terminate the employment or contractual relationship upon learning of such conviction or sanction

Claims Submission/Billing

We are committed to timely and accurate submission of claims for reimbursement of services.

- To that end, we will:

Attempt to assure that only those claims for services are billed and/or reimbursed that are:

Accurate, appropriately documented, and correctly identify the services actually provided;

Ordered and/or provided by providers who are authorized to do so (e.g., meet applicable legal, professional, and contractual requirements);

Provided in accordance with the terms of the applicable benefit program(s) (e.g., prior authorizations/appropriate referrals are obtained, etc.) in which patients are enrolled;

Medically necessary and ordered by a physician (or other appropriately licensed individual) or otherwise included as express benefits/services under the benefit program(s) in which patients are enrolled;

Not claims for patients who were referred to the medical center pursuant to contracts and financial arrangements that were designed to induce such referrals in violation of anti-kickback or self-referral restrictions; and

Not duplicative, or otherwise reimbursable by some other payer.

Follow applicable coordination of benefit rules when more than one payer may have responsibility for particular services.

Refund improper payments in accordance with legal, regulatory and contractual requirements and ethical business practices.

Fully investigate those instances suggesting fraud or abuse and take such corrective action as may be warranted, with disclosure to criminal or civil law enforcement authorities, government agencies and other third parties, as necessary or prudent.

Bad Debts

We are committed to exercising reasonable, consistent efforts to collect amounts due for services rendered, regardless of the payer, and to accurate and proper reporting of bad debts to Medicare.

- To that end, we will:

Develop and maintain a mechanism to review, at least annually, the following:

Whether we are properly reporting bad debts to Medicare; and

All Medicare bad debt expenses claimed, to ensure that our procedures are in accordance with applicable federal and state statutes, regulations, guidelines, and policies.

Assure that we have appropriate and reasonable mechanisms in place regarding beneficiary deductible or co-payment collection efforts and have not claimed as bad debts any routinely waived Medicare co-payments and deductibles, which waiver might constitute a violation of the anti-kickback statute.



Carson Tahoe **Assets & Business** Records

We are committed to protecting the assets of Carson Tahoe and assuring that business records are complete, accurate, timely, and in accordance with applicable accounting principles.

- **With respect to Carson Tahoe assets, we will:**

Exercise care in the use of property with which we come in contact in the course of our job responsibilities.

Report conditions, activities, or individuals that threaten the security or condition of Carson Tahoe property and report damage, theft or attempted theft, or conditions or practices that might cause harm or loss to such property.

Refrain from using, or permitting others to use, Carson Tahoe property for personal, unauthorized purposes.

Retain all Carson Tahoe funds in properly authorized and identified Carson Tahoe accounts, except for approved petty cash funds.

Refrain from establishing any undisclosed or unrecorded fund or account for any purpose whatsoever, even for the perceived good of Carson Tahoe.

- **With respect to business records and accounting practices, we will:**

Assure that all entries, reports, vouchers, bills, invoices, expense accounts, payroll, service and time records, or other data are accurate and sufficiently descriptive of the transactions to which they relate.

Assure that all such business records conform to accounting principles applicable to the transactions to which they relate.

Assure that no false, fictitious, or deceptive entries are made in any record.

Assure that all such records are safely stored and retained in accordance with applicable legal, contractual, and program requirements and good business practices.

Employment Practices/Work Environment

We are committed to affirming the talents and contributions of our diverse staff and to providing an equal opportunity work environment where everyone is treated with fairness, dignity, and respect.

- To that end, we will:

Encourage and provide resources and opportunities for employees to develop their professional potential.

Take reasonable steps to inform employees about, and to comply with, all applicable employment laws, regulations and corporate policies, particularly those relating to nondiscrimination in our employment practices. Such practices include compensation, corrective action, discipline, and promotions.

Refuse to tolerate harassment based on the diverse characteristics or cultural backgrounds of our staff, including sexual harassment. Sexual harassment includes unwelcome sexual advances or requests for sexual favors in conjunction with employment decisions, as well as verbal or physical conduct of a sexual nature that interferes with work performance or otherwise creates an intimidating, hostile or offensive work environment.

Take reasonable steps, including compliance with applicable laws, regulations and corporate policies, to ensure a safe, healthy, harassment-free and secure work environment.

- In particular, supervisors will:

Develop and maintain open communication with their staff, encouraging them to ask questions and raise issues or concerns when they arise. In addition they will model and encourage the practice of “two times and up” for conflict resolution. Carson Tahoe prohibits any retribution, retaliation, or harassment directed against an employee for making a good faith effort to report such concerns, whether to supervisors, someone else in the chain of command or another resource within the organization.

Adequately instruct their subordinates regarding the Code of Conduct and other legal, contractual, policy requirements, and timely disseminate relevant information to them.

Take reasonable steps to prevent and detect potential violations within their areas of responsibility, report such potential violations, and take such corrective action as may be appropriate, including disciplinary measures.

Interaction with Government & Other **Outside Entities**

We are committed to maintaining high legal and ethical standards in all our interactions with government and other outside entities.

Government Entities

- **We will:**

Comply with all applicable laws, regulations, and government program requirements.

Cooperate with all legitimate government investigations. Staff approached by persons representing themselves as government investigators, whether at home or work, are encouraged to notify In-House Counsel immediately. In-House Counsel will verify the credentials of the investigator, determine the legitimacy of the investigation and instruct staff on the proper procedures for cooperating with the investigation. Refer to Policy No. MA 4.0035, Response to Government Investigations.

• We will not:

Conceal, destroy, or alter any documents, lie, or make misleading statements to the government.

Attempt to cause a colleague to fail to provide accurate information or obstruct, mislead, or delay the communication of information or records relating to a possible violation of law, regulation, or program requirement.

Accrediting Bodies

We will deal with all accrediting bodies in a direct, open, and honest manner.

Political Activities and Contributions

No Carson Tahoe resources may be used, directly or indirectly, to contribute to political campaigns, for gifts or payments to any political party or to attempt to improperly influence government officials, nor should staff seek reimbursement from Carson Tahoe for any personal political contributions.



The Joint Commission



Compliance Program

Structure

As mentioned above, Carson Tahoe has adopted a Compliance Program to demonstrate our commitment to ethical and legal business practices and to ensure service of the highest level of integrity and concern. That commitment is expressed at every level within our organization. Our Board of Trustees is ultimately responsible for the integrity of Carson Tahoe and will hold management accountable for developing and implementing a Compliance Program that reflects Carson Tahoe's mission and values and is consistently administered throughout our operations. The Board will also monitor the ongoing effectiveness of the Compliance Program.

Senior management will be responsible for developing key aspects of the Compliance Program, assuring that adequate resources, both internal and external, are made available to assist with Carson Tahoe's compliance and integrity efforts, selecting the Compliance Officer (subject to the review and approval of the Board) and supporting the Compliance Officer and the Compliance Oversight Committee.

Oversight for the Compliance Program will be vested in a high-level individual within Carson Tahoe. This individual will be designated as the Corporate Compliance Officer and will have access to the highest levels within Carson Tahoe, reporting directly to the President/CEO and to the Board of Trustees with respect to monitoring the effectiveness of the Compliance Program. He or she will be responsible for developing, implementing, maintaining, monitoring and evaluating the basic elements of the Compliance Program and Carson Tahoe's ongoing business activities, with respect to compliance and integrity issues. A Compliance Oversight Committee will also be formed to support, advise, and otherwise assist the Compliance Officer with the Compliance Program. The Compliance Oversight Committee will be composed of personnel from key organizational and operating areas and will be managed by the Corporate Compliance Officer.

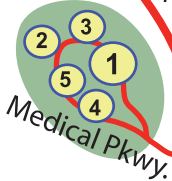
Notes:

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Carson City



Carson Tahoe
Medical Campus



Arrowhead Dr.

Nye Ln.

Carson St.

Fleischmann Way

William St.

Mountain St.

Minnesota St.

S. Stewart St.

Roop St.

50

- 1 Carson Tahoe Regional Med. Center**
1600 Medical Parkway (775) 445-8000
- 2 Carson Tahoe Cancer Center**
1535 Medical Parkway (775) 445-7500
- 3 Merriner Cottages**
1555 Medical Parkway (775) 445-7500
- 4 Sierra Surgery Hospital**
1400 Medical Parkway (775) 883-1700
- 5 Medical Office Building**
1470 Medical Parkway
- 6 11 13 Carson Tahoe Physician Clinics**
2874 N. Carson St., Suite 200 (775) 883-9003
- 7 Carson Tahoe Specialty Med. Center**
775 Fleischmann Way (775) 445-7450
- 8 Carson Tahoe Behavioral Health Svcs.**
William St. at N. Minnesota (775) 445-7350
- 9 11 12 13 Carson Tahoe Therapy**
755 Roop St., Ste 107 (775) 885-6686
- 10 Carson Tahoe Cardiac & Pulmonary Rehab**
1122 S. Stewart St. (775) 445-7310



CARSON TAHOE
Regional Healthcare
www.carson Tahoe.com

Minden



Dayton



Over 60 years of caring for the community.

Major Max C. Fleischmann questions why Carson City doesn't have a hospital and decides to challenge the community by agreeing to match every dollar the community contributed to build a hospital.



First established as a volunteer based blood transportation service, the Carson-Tahoe Auxiliary soon identifies other areas where they can lend a helping hand. As the coalition between the hospital and Auxiliary grows, so do the fundraising efforts that support the hospital's quality healthcare philosophy.

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Soon after the fundraising effort begins, Edith & Dick Waters of Carson Hot Springs jump on the bandwagon by offering 5.2 acres of land.



The Original Carson-Tahoe Hospital opens a modest 10-bed facility, as an enthusiastic Carson City community (population 2,500) joins together in celebration of the area's first hospital. The entire hospital costs \$80,000 to build.



The Carson Tahoe Regional Healthcare Foundation forms to help reach fundraising goals & support the healthcare system, comprised of volunteer members from the CTRH service area.



After a series of public meetings, the Board unanimously votes to become a not-for-profit 501(c)(3) corporation to lead Carson Tahoe Regional Healthcare into the next era of healthcare.

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02

New Women's and Children's Center opens with seven private Labor/Delivery /Postpartum rooms and a triage area.



With both Carson City and its outlying areas swiftly populating, it is determined that the best way to meet the increasing needs is to build a new facility. The vision for Carson Tahoe Regional Medical Center is born.





With plans for a new hospital in the works, the existing hospital catches fire. Fortunately, all patients are safely moved before the flames engulf the structure.



The new North Wing Expansion opens, highlighted by the addition of a new intensive care unit and 24-hour emergency services. This expansion increases the bed count to 110.



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Construction is accelerated as a result of the blaze, and the new 77-bed Carson-Tahoe Hospital opens in November.



78

A new hospital emergency room is built. The expanded ER services allow Carson-Tahoe to reach out to the rural areas with exceptional care.



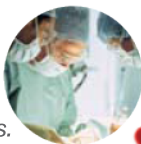
79



05

Carson Tahoe Regional Medical Center – a three story, 352,000 square foot facility set on an 80-acre medical campus in Carson City – opens its doors to the public, complete with 144 acute care beds. Over 240 board-certified physicians in 35 medical specialties call it home.

The first open heart surgery is performed at Carson Tahoe Regional Medical Center to great success.



06



The Carson Tahoe Cancer Center is unveiled as Northern Nevada's first and only freestanding, comprehensive Cancer Center accredited with commendation.

Carson Tahoe Regional Healthcare celebrates its Diamond Anniversary celebrating 60 years of community service.



CELEBRATING
SIXTY YEARS
1949-2009



09



CARSON TAHOE

Regional Healthcare

www.carsontahoe.com



Joint Commission
Accredited



Commission
on Cancer

1600 Medical Parkway | North Carson City

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