

Mission Hospital , Inc.
SUMMARY OF OUR BUSINESS ETHICS PROGRAM
COMPLIANCE POLICY MANUAL

For Contractor/Vendor Representatives

Hospitals in Texas and throughout the country are operating under an ever-expanding framework of statutes and regulations. In order to best ensure that Mission Hospital, Inc. and its contractor/vendor representatives remain in compliance with applicable laws and regulations, and to detect possible violations of these laws when they occur, Mission Hospital has adopted a Business Ethics Program Policy Manual and has begun implementing its Business Ethics Program.

The Board of Directors of Mission Hospital, Inc. (the "Hospital") considers it desirable to publish this Summary Policy on Business Ethics in order to assist contractor/vendor representatives to avoid both the fact and appearance of improper corporate activities and in assuring that all applicable laws are obeyed.

This summary is to be distributed to all contractor/vendor representatives.

General Policy- It is the Policy of Mission Hospital, Inc. to provide services in compliance with all state and federal laws governing its operation, and consistent with the highest standards of business and professional ethics. This policy is a solemn commitment to our patients, community, government agencies and to ourselves.

Requires all contractor/vendor representatives to comply with these policies. Conduct that does not comply with the Policy Manual is not authorized by the Hospital, is outside the scope of employment and professional staff membership, and may subject contractor/vendor representatives disciplinary action.

Requires any subject contractor/vendor representatives who becomes aware of any apparent violation of the Hospital's policies to report it to his/her supervisor, manager, or to the Compliance Officer at ext. 435, fax ext. 463, or hotline 1-800-273-8452. Reports are confidential to the fullest extent possible. If an employee or professional staff member does not report conduct violating the Hospital's policies, that employee or professional staff member may be subject to disciplinary action, up to and including termination of employment or revocation of privileges.

Payments, Discounts, and Gifts -It is illegal for the Hospital to provide or accept payment in exchange for referrals of patients, goods or services covered under the benefits of Medicare or Medicaid.

Billing and Claims - Mission Hospital, Inc. only bills for services rendered and all bills must comply with billing requirements for government-sponsored programs and other payors.

Patient Referrals -Patients or their legal representatives are free to select their health care providers and suppliers subject to the requirements of their health insurance plans.

Physician Recruitment -Physicians cannot be required to refer patients to the Hospital, and the amount of compensation or support cannot be related to the volume or value of referrals.

Physician Practice Acquisition-

Generally, amounts paid by the Hospital or acquisitions must reflect the fair market value of the acquired practice.

Patient Transfers -Each patient who presents at the emergency department must receive an appropriate medical screening examination. Patients cannot be transferred from an emergency room to another facility unless it is medically appropriate.

Market Competition-Hospital policy prohibits unreasonable restraints of competition and agreements to fix prices, divide markets, and boycott competitors.

Tax Exempt Organizations -As a not-for-profit hospital serving charitable purposes and providing a community benefit, the Hospital holds federal tax-exempt status. Private individuals may not receive more than an incidental benefit from Hospital assets or receive any "private inurement".

Tax Exempt Bonds -Federal securities laws govern the dissemination or use of information, which might be of interest to persons considering the purchase or sale of bonds.

Waste Disposal-The Hospital is committed to safe and responsible disposal of bio-hazardous waste and other waste products.

Controlled Substance-Improper use of these substances is illegal and extremely dangerous.

Confidentiality-Hospital employees and health care professionals possess sensitive, privileged information about patients and their care. Employees should not discuss patient's medical condition or provide any information about patients to anyone other than Hospital personnel who need the information or other authorized persons. Proprietary business information should also be kept confidential.

Discrimination-The Hospital is committed to a policy of nondiscrimination and equal opportunity for all qualified applicants and employees, without regard to race, color, sex, religion, age, national origin, ancestry, disability, veteran status or any other criteria illegal under applicable discrimination statutes. Our policy of nondiscrimination extends to the care of patients.

Political Contributions -The Hospitals political activities are limited by law. Corporations may not make any contributions, direct or indirect, to candidates for federal office.

Purchasing -The Hospital is committed to a fair and objective procurement system, which results in the acquisition of quality goods and services for the Hospital at a fair price.

Fund Raising- It is illegal for any employee or representative of the Hospital to make any false or misleading statement in connection with a solicitation of funds or sale of goods or services to benefit the Hospital.

Conflicts of Interest-Hospital employees should act with total objectivity in carrying out their duties for the Hospital and should avoid all potential conflicts of interest.

Independent Contractors and Vendors-The Hospital's policy is that all contractors and vendors who provide items or services to the Hospital must comply with all applicable laws and Hospital policies.

Regulations-The Hospital's policy is to comply with the regulations that control the licenses and certifications that allow the Hospital to deliver care to its patients (i.e. JCAHO, OSHA, Medicare certification and conditions of participation, etc.)

Response to Investigations-The Hospital will comply with subpoenas and cooperate with governmental investigations to the full extent required by law.

Federally Funded Grants-Hospital personnel will abide by all applicable regulations, including but not limited to, accurate reporting and appropriate expenditures of grant funds.

Reporting Requirements-Individual personnel must make themselves aware of specific provisions governing reporting requirements (i.e. suspected abuse and neglect cases, communicable diseases, gunshot wounds and others governed by licensing acts).

**CONTRACTOR/VENDOR REPRESENTATIVE CERTIFICATION
AND AGREEMENT OF COMPLIANCE**

I hereby certify that I am a duly-authorized officer of the independent contractor/vendor representative named below ("Contractor/Vendor Representative). On behalf of the Contractor and its officers, directors, employees, and agents, I certify that I have received and read the "Summary of the Business Ethics Compliance Policy Manual" of Mission Hospital, Inc. (the "Hospital"), and fully understand the requirements set forth in that document. I certify that the Contractor/Vendor Representative shall act in full accordance with all rules and policies of the Hospital. These rules and policies include the Hospital's commitment to comply with all applicable federal and state laws, and the Hospital's commitment to conduct its business in compliance with the highest ethical standards.

To this end, the Contractor/Vendor Representative expressly agrees that the Hospital's "Business Ethics Compliance Program" shall be incorporated within and made a part of the Contractor's/Vendor Representative agreement with the Hospital and shall survive termination of that agreement for any reason. Any failure of the Contractor/Vendor Representative to comply with the rules and policies set forth in the Hospital's Business Ethics Compliance Program, or to report violations of these rules and policies, may result in immediate termination by the Hospital of its agreement with the Contractor/Vendor Representative.

Name of Contractor/Vendor Representative: Ramon Garcia, County Judge

Company: Hidalgo County

Address: 1304 S. 25th Ave. Edinburg, TX 78542

Signature: _____

Date: _____