

Code of Conduct



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A Message from the CEO



Dear Colleagues,

As a leader in the provision of comprehensive healthcare to our patients and communities, Sentara Health is committed to doing so with the highest standards of integrity, excellence, and safety. We all play an integral role in helping Sentara Health achieve its mission and vision, and we are all required to work together to create a work environment that is based on the principles and values of integrity, respect, and professionalism.

The Sentara Health Code of Conduct is the cornerstone of our corporate integrity philosophy and provides each of us with the necessary guidance to ensure that our work is carried out in an ethical and lawful manner. It highlights our shared culture of integrity and our responsibility to operate according to the highest principles and ethical business standards as we strive to provide the best care for our patients and to treat each other with honesty, integrity, and compassion through teamwork.

I want to make sure you feel comfortable asking questions about any of our policies. We strive to make Sentara Health a place where you can always feel free to address a concern or situation about how we behave. Your manager, Human Resources representative, Chief Compliance Officer, or Legal Department is available as important resources. Sentara also has a Compliance Hotline, an anonymous and confidential tip line that is available 24 hours a day, 7 days a week, by phone at 1.800.981.6667.

At Sentara Health, we are all guardians of our reputation for ethical business practices. By committing to our Code of Conduct, you help us ensure that we always do the right thing. Thank you for your commitment to our patients and communities and for supporting what we stand for.

Dennis Matheis President and Chief Executive Officer Sentara Health

Our Mission

We improve health every day.

Vision

Our vision is to be the healthcare provider of choice for our patients and the communities that we service.

Values

Our values and vision guide the choices that we make every day. Our vision guides us – affirming the direction we are all headed together. Our values -People, Quality, Patient Safety, Service, and Integrity – outline how we interact with those around us.

Our vision and values set the tone for our culture and ethical behavior and form a solid foundation for this Code of Conduct. "Partner with patients, members and their families to achieve better health outcomes and help prevent future problems."



Our Commitment to What Is Right

At Sentara Health, we are committed to excellence in customer service, sensitivity to customer needs, and delivering high-quality health care services ethically and professionally. Our Code of Conduct serves as a living resource for you in supporting your day-to-day decision-making and serves as the core of how we create a solid foundation of trust and success reflected in our relationships with our patients' customers, suppliers, and each other. The Code applies to everyone: Team Members, managers, officers, and directors.

Our Code:

- Establishes the foundation of Sentara Health's ethics.
- Communicates our ethical philosophy and commitment to all patients, customers, staff, and the communities in which we do business.
- Obliges us to comply with laws, regulations, and company policies.
- Ensures that integrity and ethics are maintained in all business relationships.
- Serves as a resource when legal or ethical appropriateness questions arise not as a comprehensive rulebook but rather a statement of how we commit to doing business.
- Encourages ethical decision-making and discussion to improve how we deal with concerns we encounter every day at work.
- Sets the foundation for our existing policies and procedures.

This Code does not cover every issue or situation you may encounter. Use the Code and the other Sentara Health policies or procedures as a guide. You're expected to use good judgment and seek guidance if you need clarification. Sentara Health has many resources to assist you with clarifying your understanding and addressing your questions; some of those resources include your managers, Compliance, Legal, and Human Resources departments.

All Team Members and those acting as agents on behalf of Sentara Health must respect and comply with our Code, Sentara Health policies and procedures, and applicable laws and regulations in the states, counties and cities, and any other

Sentara Health expects you to:

- Follow both the spirit and letter of the Code in all business matters.
- Understand the Code and seek advice when you need clarification.
- Conduct business ethically and act following our vision, values, and the Code.
- Follow any applicable legal requirements of all locations in which we do business.
- Speak up if you have concerns or suspect violations of the Code, laws, regulations, or Sentara policies.

jurisdiction in which Sentara Health conducts business. In some regions, local laws, regulations, or business requirements may be stricter than the policies outlined in this Code. We expect you to follow the local laws, regulations, or business requirements in those cases. In those instances where the Code appears to violate an applicable law or regulation, that law or regulation will supersede the Code. Please bring any discrepancy between the Code and any law or regulation to the attention of the Compliance or Legal departments.

We are committed and accountable to our Code. However, for those who choose to violate our Code, disciplinary actions, up to and including potential termination of employment or other appropriate

consequences, may be taken. The corrective action given upon a violation of our Code will depend on the type of violation and the severity of the breach. In addition, where violations of our Code also violate a law, you may be subject to other legal liability.

Voicing Your Concern

We all have a responsibility to raise concerns of known or suspected violations of the Code, laws, regulations, or Sentara Health policies.



"Sentara's reputation depends on you doing your part to report."

Reporting Compliance Concerns

The Sentara Integrity Compliance and Ethics Standards are designed to promote honesty and fairness to everyone with whom you interact. It is your responsibility to ensure all your associations with patients and the community are honest and that you are familiar with and adhere to these standards and all company policies and procedures.

Sentara's reputation depends upon you doing your part to report any questionable ethical actions or suspected violations. You are asked to be responsible for letting someone know when a problem exists so that it can be remedied and violators can be disciplined. Often, the most effective method to resolve concerns internally is through two-way conversations with your manager or leadership team members, including Human Resources. Our managers and local leadership teams are often closest to the issue and can respond quickly to your concerns.

Hotline Webform website:

You may report your concern online through the website <u>https://app.mycompliancereport.com/report.aspx?cid=sen</u>

Call the Hotline: Dial **1.800.981.6667**

Sentara Health's Compliance, Ethics, and Privacy hotline is staffed 24 hours a day, seven days a week, by a third-party company to gather information regarding compliance and ethics concerns on behalf of Sentara Health.

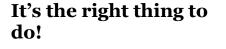
Additional Resources:

Resource	Phone Number
Your Manager	Department directory
Human Resources	757-455-7744
Compliance and Organizational Ethics	757-455-7788
Sentara Legal Department	757-455-7114
Chief Compliance Officer and Audit Executive	757-455-7780
Sentara Public Relations Pager	757-671-4971
Ethics Call	757-252-9550

We encourage anyone who needs to voice a concern to contact the following individuals at Sentara Health directly:

Legal, Human Resources, or Compliance Departments

Send an email: <u>corp_compliance@sentara.com</u>





Commitment to Non-retaliation

Any employee who reports suspected violations is protected by Sentara Health policy from any type of retribution or retaliation. Any member who reports a false claim to the Federal or state government is entitled to whistleblower protections, including protection from retribution or retaliation from their employer.

Compliance Investigations

Each report to Compliance is reviewed, and assessed to determine whether further investigation is necessary or if appropriate action should be taken. Investigations will be conducted promptly and comprehensively in accordance with local laws. Our inquiries are conducted with integrity, discretion, and impartiality to ensure fairness and confidentiality. We expect full and candid cooperation from you. When legally feasible, we will inform you of the status of an investigation. Please do not conduct your own investigations, as such actions could compromise the investigation's integrity.

> We are committed to non-retaliation and maintaining confidentiality within the limits of the law for those who report in good faith by any method.

Our Commitment to Non-retaliation

If you report a concern, Sentara will not discipline, discriminate, take any adverse employment action, or retaliate against you. We are committed to not retaliating and maintaining confidentiality in accordance with the law, whether or not such information is ultimately proven correct. This commitment extends to anyone who cooperates in any investigation or inquiry regarding such conduct. That said, intentionally submitting false or misleading allegations might harm the reputation of an associate or the company, which demonstrates a lack of respect for your colleagues and is a severe offense. You must ensure this does not happen.



Good faith means you earnestly believe there is a sincere concern, and it is not something malicious or false. Q Nurse Megan complains to her manager that her working conditions are unsafe and risks patient health. Her manager brushes off her concerns. Soon after, her manager transfers her to another position in a different department. Sara believes this is in retaliation for reporting a safety concern, what should Sarah do?



If Nurse Megan believes she is experiencing retaliation for reporting a concern, she should immediately contact Human Resources or the Compliance Department.

Our Commitment to You

Equal Opportunity Employer

At Sentara Health, we take our responsibility as an equal opportunity employer seriously. We are committed to maintaining a work environment free from discrimination, intimidation, or exploitation. All Team Members are expected to contribute to an environment where we behave following all equal opportunity laws or regulations wherever we operate. This commitment extends to all Team Members regardless of race, ethnicity, religion, national origin, gender, sexual orientation, age, disability, or other factors protected by law.

Harassment-Free Environment

You have the right to work in an environment free from harassment. Sentara Health is committed to providing a work environment that respects each employee's rights, dignity, and cultural differences. Harassment, which includes discriminatory treatment, abuse, or intimidation in the workplace, will not be tolerated regardless of position. All Team Members are expected to demonstrate proper respect and consideration for each other.

Harassment can come in many forms, including any behaviors that:

- Impacts or influences wages, hours, working conditions, or other terms and conditions of employment.
- Is based on race, ethnicity, religion, creed, gender identity, sexual orientation, age, disability, national origin or ancestry, citizenship, marital or veteran status, political or union members, family or medical leave status, or any other status protected by law.
- Creates an intimidating, offensive, abusive or hostile work environment.

If you believe that you or someone else has been subjected to conduct in violation of this policy, you should immediately report the offending behavior to your manager or another member of management, Human Resources (Create a Workday case or by calling 757-455-7744), or by contacting the Sentara Compliance, Ethics and Privacy Hotline (1-800-981-6667).

Workplace Environmental Health

Sentara Health provides a safe and healthy environment for all Team Members, contractors, physicians, patients, and visitors, abiding by all government legislation, regulations, and accepted industry standards. Each of us is responsible for maintaining a safe, healthy, and environmentally friendly workplace. Medical waste, environmentally sensitive material, and hazardous materials are to be appropriately disposed of, and any spills or accidents involving hazardous materials are to be promptly reported and handled.

Safety and Security

Each of us is responsible for keeping our facilities secure. Violence or threats of violence are strictly prohibited. We commit to never:

- Make or send harassing or threatening remarks, calls, e-mails, or other verbal or written communications to anyone.
- Stalk any other person.
- Destroy personal and or company property.

Dangerous items of any nature, such as weapons, explosives or firearms, are not permitted on company property or in your possession while conducting Sentara business off-site. Promptly contact Human Resources or your manager if you observe any inappropriate or dangerous behavior. Any violations of these guidelines for maintaining a safe environment are grounds for disciplinary action, up to and including potential termination.

You should ensure our facilities are secure at all times. You should not allow anyone entry to a Sentara facility who

does not have proper security access (ID badge swipe, keypad code, etc.). If a person is following you and does not have the appropriate security access, instruct them to go to the designated reception area. All staff and visitors must wear the properly designated Sentara Health identification badge while in our facilities.

Substance Abuse/ Drug and Alcohol-Free Workplace

Sentara has a vital interest in maintaining safe, healthy and efficient working conditions for its Team Members and a responsibility to provide a safe and healthy environment for its patients and the general public. Sentara Health requests you to work free from the influence of any substance, including drugs or alcohol, which may prevent you from conducting work activities safely and effectively. Sentara Team Members are not to be involved with the unlawful use, possession, sale or transfer of illegal drugs or controlled substances, including alcohol, in any manner that may impair their ability to perform assigned duties or otherwise adversely impact the organization's business. Sentara is committed to maintaining a workplace free of the influence of drugs. For more detailed information, please visit the <u>Drug-Free Workplace and Substance Abuse Policy</u> on WaveNet.

Personal Information

We respect our Team Members' personal information and treat all salaries, benefits, and personnel files as confidential, and only use or access this information for authorized business purposes.

Our Commitment to Our Patients



"Patients have a fundamental right to considerate care that safeguards their personal dignity and respects their cultural and spiritual values."

Quality of Patient Care

The Sentara Promise Program proves Sentara's commitment to providing quality services. The Sentara Promise hotline is available at (757) 388-HELP (4357) for patients, family members, and health plan members to express their concerns, praise, or ask for general assistance.

Patient Rights

Patients have a fundamental right to considerate care that safeguards their personal dignity and respects their cultural and spiritual values. Understanding and respecting these values guide us in meeting patient care needs and preferences. Sentara's goal is to improve patient outcomes and maintain high standards of medical ethics in the delivery of patient care by respecting patient rights ethically and professionally.

Emergency Treatment

When an individual is present at the hospital, Sentara Health will provide the healthcare services required under the law regardless of their ability to pay. We follow the federal law, Emergency Medical Treatment and Active Labor Act ("EMTALA"), providing an emergency medical screening, examination, and necessary stabilization to all patients before any transfer or discharge.

Privacy and Confidentiality

Protecting the privacy and confidentiality of patients' information is a top priority. We do not tolerate deliberate breaches of privacy or confidentiality. We are committed to maintaining the confidentiality of Team Members, patients and other sensitive or proprietary information in accordance with legal, regulatory and ethical standards.

Workforce members must:

- adhere to all established confidentiality, privacy and security policies, procedures and laws including the Health Insurance Portability and Accountability Act (HIPAA).
- respect the privacy of our patients.
- actively protect and safeguard patients' Protected Health Information (PHI) and patients' personal information in all forms, including paper, electronic, verbal, and telephonic.
- only access a patient's chart or medical data when involved in that patient's care, or when you need access to the chart for a legitimate, approved work-related reason such as billing, administrative, teaching or research requirements.
- share only the minimum necessary to meet a request.

- ensure that information is shared in a secure manner when sending electronic PHI.
- secure patients' information by using encrypted and passwordprotected electronic devices only (i.e., laptops, etc.) and by following all applicable Sentara IT Security policies.
- not discuss patient information in public areas, including, but not limited to, elevators, hallways, and dining areas.
- seek permission from the patient before discussing patient information in front of patient family members and/or friends.

HIPAA

The HIPAA regulations provide patients with certain rights regarding their protected health information. Indivdiuals have the right to obtain a copy of the Notice of Privacy Practices. The Notice of Privacy Practices provides patients with information about how Sentara protects their information and their rights per the HIPAA regulations. Copies of the Notice of Privacy Practices are available at all Sentara facilities or by clicking on this link: <u>Integrated Notice of Privacy Practices</u> | <u>Sentara Health</u>.

Confidentiality

It is the responsibility of all Sentara workforce members to maintain the confidentiality of patient information. Workforce members are educated on the importance of protecting and maintaining the confidentiality of all patient information.

Use of Electronic Media

All communication systems provided by Sentara Health, including computers, e-mail, instant messaging, Internet access, social media, telephone, and voicemail systems, are the property of Sentara Health and are to be used primarily for business purposes. Accordingly, Sentara Health reserves the right to monitor all aspects of the usage of these systems for appropriateness and to ensure the use supports the business goals of Sentara Health.

Social Media

Sentara Health Community members may use social media on various platforms such as Facebook, LinkedIn, Twitter, blogs, etc., during their personal time. During such use, you are expected to follow all Sentara Health policies, including privacy and confidentiality, and not let your use of social media interfere with your job responsibilities. You may not post any protected health information, (PHI) pictures, or comments regarding a patient of Sentara Health. Internet activity must not be represented as an official Sentara-sponsored site or page, nor can the Internet posting claim to speak on behalf of the company.

Ethics

Sentara Health is committed to creating and maintaining a professional, ethical, and respectful workplace. Be honest and respectful and adhere to ethical standards when dealing with colleagues, staff, patients and their families, the public, auditors and government officials, and any others with whom Sentara Health does business. Abusive and disruptive behavior is not tolerated. "It is the responsibility of all Sentara Team Members to maintain the confidentiality of patient information."

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Our Commitment to Sentara

Gifts and Gratuities

Employees shall not solicit a gift, meal, entertainment, or other business courtesy in their pursuit of a business transaction, and shall not use or allow gifts, business courtesies, or other incentives to improperly influence relationships or business outcomes.

If a patient or a patients' family members wish to give a monetary or non-perishable/consumable gift to Sentara or Employees, they should be directed to the Sentara Foundation. Offers of money, gifts, or entertainment should be reported to your supervisor. Any question concerning gifts or entertainment should be resolved through discussion with appropriate supervisory personnel, your human resources representative, or the Compliance Department. For more details, please see Compliance policy Gifts and Other Business Coutesies on Compliance360.

Company Assets

Employees are personally responsible and accountable for the proper expenditure of company funds and the use of company property. Surplus, the obsolete or junked property should be properly disposed of and recorded. Each employee is responsible for protecting computer systems and networks from unauthorized use, access, or software modification. Sentara also requires Team Members to protect customer property to the extent possible.

Sentara Team Members are expected to:

- Follow established internal control procedures in handling and recording all funds and property;
- Be personally responsible and accountable for the proper expenditure of Sentara funds and the proper use of company property;
- Obtain approval from the appropriate authority, as provided in policy and procedure manuals, before commitment or expenditure of Sentara funds;
- · Preserve Sentara's assets, property, facilities, equipment, and supplies; and
- Dispose of surplus, obsolete, or junked property following Sentara policies and procedures. Unauthorized disposal of property is a misuse of assets.

Any improper financial gain to an employee through misconduct involving Sentara owned or patient property, including the outright theft of property, embezzlement of money, or the use of funds belonging to Sentara or its customers for anything other than an authorized purpose, is a severe violation and may lead to legal prosecution.

Proprietary Information

We do not share confidential information related to Sentara Health's business or operations, including financial data, business strategy, pricing, contract terms, or any form of proprietary information unless it is to an authorized person and for a legitimate business reason. If you receive a request from the media for Sentara Health's information, it is best to decline to comment and refer them to the Sentara Public Relations department at (757) 671-4971.

Political Activities

Sentara Health is a tax-exempt organization under Section 501(c)(3) of the Internal Revenue Code because of our charitable mission. To maintain this status, Sentara Health follows specific laws and regulations requiring it to pay only fair market value for goods and services, not to engage in private inurement or substantial lobbying activities. Sentara funds or assets will not be used for any political party or organization or for any individual who holds public office or is a candidate for public office.

Sentara's tax-exempt status requires that we do not fund or participate in political activities. As a result, the IRS can impose excise taxes on these political activities, and the company's tax exemption can

ultimately be revoked for participating in political activities.

Conflicts of Interest

Sentara Health encourages the development of creative and innovative ideas, goods, services, and businesses to ensure that the organization and Team Members are successful through a philosophy of mutuality of interest.

While Sentara does not wish to interfere with Team Members' time or activities away from work, any business or other interest that may present a conflict to the organization must be disclosed. Please see Compliance policy Disclosure of Conflict of Interest on Compliance360 for more information.

Coding and Billing

Submission of any claims for payment or reimbursement of any kind that are false, fraudulent, inaccurate, incomplete, fictitious, or duplicative will not be tolerated.

There are strict federal and state laws and regulations governing the third-party billing of our insured patients. The company and Team Members can be prosecuted for filing inaccurate claims for reimbursement, which carries substantial civil fines or criminal penalties, or both.

The same high standards we apply to government claims will also be applied to other third-party carriers who submitted claims for payment or reimbursement. Sentara Integrity requires:

- Employees who perform billing, coding, and charge entry shall take every reasonable precaution to ensure that their work is accurate, timely, and compliant with Sentara policies, federal and state laws, and regulations.
- Employees whose responsibilities include charge entry and claims billing will use codes that accurately reflect the provided services and are medically necessary.
- Sentara shall submit claims only for services and supplies ordered by a physician and supported by documentation in the patient's medical record.
- Employed staff will immediately notify management and the payor, correct inaccuracies discovered in bills that have been submitted, and promptly refund any money received that is not due to us. In addition, Team Members shall ensure our pricing is fair and competitive.

Clinical Research

All Team Members of Sentara Health should understand their obligations and responsibilities as they pertain to good clinical practices. Employees engaged in research are expected to always conduct their research with integrity and intellectual honesty and with appropriate regard.

Competition and Antitrust



"Submission of any claims for payment or reimbursement of any kind that are false, fraudulent, inaccurate, incomplete, fictitious, or duplicative will not be tolerated." The Sentara Health Community must comply with applicable antitrust and similar laws that regulate competition. Antitrust and competition laws forbid any understanding or agreement, whether written or verbal, between competitors to fix or control fees for services, terms conditions of treatment patients divide markets boycotts, or engage in any other conduct that restrains competitions.

Sentara Team Members will refrain from discussing proprietary or confidential information, such as pricing policy, terms and conditions, costs, inventories, marketing and product plans, market surveys and studies, production plans, and capabilities. Sentara will compete fairly in the market. We will not agree with a competitor about prices to charge, whom to call on for sales, and what services to offer.

Federal and State False Claims Act

One of the primary purposes of the False Claims Act is to combat fraud and abuse in government health care programs.

The False Claims Act prohibits, among other things:

- Knowingly presenting or causing to be presented to the federal government a false or fraudulent claim for payment or approval;
- Knowingly making or using, or causing to be made or used, a false record or statement to have a false or fraudulent claim paid or approved by the government;
- Conspiring to defraud the government by getting a false or fraudulent claim allowed or paid; and
- Knowingly making, using, or causing to be made or used a false record or statement to conceal, avoid, or decrease an obligation to pay or transmit money or property to the government.

Virginia and North Carolina have False Claims Acts that mirror the federal False Claims Act. Therefore, the actions that trigger civil penalties under the Virginia and North Carolina False Claims Acts are identical to those of the federal Act. In addition, both the Virginia and North Carolina Acts also include the whistleblower provision preventing employers from retaliating against Team Members who report their employer's false claims.

Physician Contracting

The Legal Department should be contacted before contracting with physicians for services to ensure that any contractual arrangements do not violate the Anti-Kickback Statute, Stark Laws, and IRS (Internal Revenue Service) regulations regarding private inurement and private benefit.

The Anti-Kickback Statute prohibits payments or other consideration given to physicians for referrals for services, and the Stark laws prohibit selfreferral. In addition, the IRS prohibits any individual, including physicians, from receiving a private benefit as the result of their relationship with a taxexempt health care organization. A private benefit could be any amount above fair market value related to the contractual arrangement.

All contractual arrangements with clinicians and referral sources must identify the specific services they are paid to provide, realistic time commitments, and the compensation rate for those services at fair market value. The compensation rate cannot be based on the volume or value of any business referred to Sentara. Please visit the <u>Legal Department</u> site on WaveNet to access updated forms and documents related to physician contracting.

"Sentara Team Members will refrain from discussing Sentara proprietary or confidential information."



Physician Referrals

Sentara employed staff are prohibited from knowingly and willfully soliciting or receiving, or offering or paying, any remuneration (including any kickback, bribe or rebate) directly or indirectly, in cash or inkind, in return for:

- referring an individual to a provider to furnish, or arrange to provide any item or service for which payment may be made; or
- purchasing, leasing, ordering, or arranging for such when payment may be made in whole or in part.

Bribes, kickbacks, or any kind of benefits intended to induce patient referrals are strictly prohibited. Employed staff is expected to conduct business with all parties, including Team Members, health care professionals, vendors, and payors, according to high moral and ethical standards.

Sentara Integrity guidelines require that Team Members report any practice or condition that may violate any law, rule, regulation, safety standard, or company policy to appropriate levels of management or the Compliance Department.

Important Note: No transaction is to be undertaken with physicians without first gaining approval from the Legal Department.

Copyright Laws

Sentara Team Members, contractors, and consultants may not duplicate copyrighted materials in any form without the written permission of the license holder. You must retain the written authorization that was received. It should be filed with a copy of the document for which copyright permission was obtained.

Vendor Management

Employees and agents involved in negotiating contracts for Sentara will ensure that all statements, communications, and representations are open, accurate, appropriate, and truthful and comply with applicable laws and regulations. In addition, Team Members must inform their



supervisors of conflict of interest or potential conflicts of interest with vendors and retain from participating in contract negotiations with any vendor they have a conflict of interest.

Cooperation with Government Investigations

All requests for information from any regulatory agency to the Company should be complied with in an accurate and timely manner and in conformance with applicable laws and regulations governing such requests for reports or information.

All notifications from a governmental regulatory agency or its representative to Sentara regarding a violation or citation alleging a violation should be referred to the Compliance or to the Privacy Departments as appropriate, as well as to the appropriate manager, director, and/ or vice president for their immediate attention.

You should contact the Legal Department immediately upon receipt of any non-routine request (subpoena, affidavit, warrant, etc.) from any government agency or its representative to Sentara. The Legal Department will provide direction for responding to investigations and requests for information from the government, so their activities are not obstructed and Team Members understand their role.

For more information on who should receive copies of the requests, please view Legal Policy for Responding to Subpoenas and Civil Investigative Demands available in Compliance 360.

Compliance with Laws and Regulations

Sentara will comply with all applicable federal and state laws, regulations, standards, and other compliance requirements at all levels of government and within the various health professions employed by the company. We will not pursue any business opportunity that requires unethical or illegal activity. If you are unsure of the legality of any action or proposed action, you should seek advice from your supervisor, manager, or the Legal Department before taking action.

Accounting and Record-Keeping

As good stewards, members of the Sentara Health Community must strive to protect and preserve the organization's assets through efficient and effective use of resources. All company records (financial, clinical, and employee) will be accurate, timely, reliable, and properly stored.

All transactions must be appropriately documented, approved, and used for the purpose intended. Sentara Integrity guidelines emphasize the need for honesty, integrity, and accuracy in our conduct and all of our recordkeeping transactions.

Financial Records

You must maintain an elevated level of accuracy and completeness in the documentation and reporting of our organization's financial records. It is essential to follow Sentara Health policies that address documentation compliance and our commitment to complete, accurate, and timely regulatory reporting.

Management of Donated Funds

Sentara Health and its member organizations, as non-profit organizations, are supported by individual, foundation, and corporate donors. We have been entrusted with these funds to achieve our mission, and we take our duty to use these funds carefully and to meet our responsibilities to donors very seriously. Please contact the Sentara Foundation for any questions you may have regarding solicitation of fund or use of donations.



