



“Billing Standards of Conduct”

Kickback Prohibition:

SHW does not provide incentives to attract patients nor do we engage in any other activities that would violate Anti-Kickback Statutes.

Refund of Overpayments:

If SHW determines that an overpayment has been made, the credit balance will be submitted for refund to the proper party, regardless of whether a refund has been requested.

Courtesy Discounts and Waivers of Co-Payments:

SHW does not waive or adjust co-payment or deductible obligations of patients, unless instructed to do so by our client, who we believe in good faith will uphold legal standards. Hardship, bad debt, and out-of-network adjustments are to be utilized only when the patient meets the documented requirements for the adjustment and will be used without discrimination.

Honesty:

SHW will follow ethical business operations and good common sense, promoting a “best practice” approach. No SHW employee or subcontractor/agent will attempt to mislead government bodies or agencies to influence actions or decisions.

Cooperation with Government Investigations:

SHW, LLC will be cooperative and forthcoming in any government inquiries, including audits, questioning, and reviews.

Financial Interests:

SHW’s administrators, employees and subcontractors/agents may not solicit or accept gratuities, favors or bribery that may influence sound and legal business decisions.

Confidential Information:

All employees and subcontractors/agents of SHW are required to sign applicable Confidentiality Agreements (employees) and Second Tier Business Associate Agreements (subcontractors/agents) to protect health information handled through business operations. These agents will be in accordance with the Health Insurance Portability and Accountability Act (HIPAA) of 1996. Additionally, confidential information about SHW is not to be communicated outside of the company by any employee without explicit written authorization of the administration.

Violations of Standards of Conduct:

Violations of SHW’s standards of conduct must be promptly reported to the Compliance Manager. If the Compliance Manager or another administrative member has violated the standards, another manager must be notified.

SHW Compliance Manager: Andrea Robbins, FNP-C - andrea.robbins@sapphirehealthaz.com

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