



**St. Luke's University Health Network and its Affiliates  
Compliance Program**

**CODE OF CONDUCT**

**An Ethical, Honest Workplace Begins with You!**

**Revised: August 2017**



**The mission of St. Luke's University Health Network (SLUHN) is to provide compassionate, excellent quality and cost-effective health care to the residents of the communities we serve regardless of their ability to pay for health care.**

**St. Luke's University Health Network and its Affiliates Code of Conduct**

## I. Introduction to the Standards

The mission of St. Luke's University Health Network (SLUHN) is to provide compassionate care. We provide quality and cost-effective health care to the residents of the communities we serve. We provide this care regardless of their ability to pay. Our mission is focused on one individual: **the patient**.

- We conduct ourselves in an ethical manner. We follow the law.
- We show respect for ourselves and others.
- This behavior is in keeping with our values of **PCRAFT- PRIDE, CARING, RESPECT, ACCOUNTABILITY, FLEXIBILITY AND TEAMWORK**.

The Code of Conduct ("The Code") summarizes the behavior expected by everyone. This includes directors, managers, team members, medical staff, volunteers, vendors, and contractors. No one is exempt from "The Code".

"The Code" does not replace your sense of fairness, honesty and decency. It gives you direction when you face a situation that "just doesn't feel right". If this happens, speak with your supervisor. If you are not comfortable talking to your supervisor, you can speak with Human Resources or the Chief Compliance & Privacy Officer at 484-526-3288. You can also use the confidential **Hotline at 1-855-9 ETHICS or 1-855-938-4427 or go online at [mysaintlukes.alertline.com](http://mysaintlukes.alertline.com)**.

- SLUHN will do everything possible to protect your confidentiality.
- SLUHN prohibits retaliation against any employee who raises a concern or asks a question in good faith.

"The Code" covers a wide range of situations that you might encounter. Please read it carefully and keep it on hand when you have questions. You must sign a statement that you have received and will read "The Code" Make sure you understand it and are willing to comply with all policies. If you have any questions, please contact your supervisor, Human Resources or the Chief Compliance & Privacy Officer at 488-526-3288, or call the confidential Hotline at 1-855-9 ETHICS or 1-855-938-4427 or go online at [mysaintlukes.alertline.com](http://mysaintlukes.alertline.com).

## II. Patient Confidentiality and Relations

### Confidentiality of Patient Information

- Unless you have a reason to open and read medical records, **don't do it!!!**
- Unnecessary use and disclosure of patient information is against the law. It can lead to corrective action, up to and including termination.
- Do not discuss patient information in public. Examples of these areas are corridors, elevators, cafeterias, and bathrooms.

**Patient Safety:** SLUHN is committed to providing a safe environment for our patients and employees. You are responsible for reporting any concern, large or small. The electronic “Patient Safety Event Reporting System” is a system available for reporting concerns. It is accessible to all staff on MyNET. The Patient Safety Hotline is available 24 hours a day. This Hotline should be used to report situations involving actual or suspected patient harm.

- Patient Safety Hotline: (484) 526-4055

### Patient Rights:

- Our patients have the right to quality care without regard to payment, race, color, religion, ancestry, or sex. Patients also have a right to quality care without regard to gender identity, nationality, sexual orientation, disability, age, genetic information or other characteristics defined by the law.
- We respect the right of a patient to make informed decisions about his or her health care. Each patient or their representative is provided information regarding care. This information includes diagnosis, treatment plan, and the right to refuse or accept treatment. SLUHN also provides information about advance directives and an explanation of the risks, benefits and alternatives associated with the treatment plan.
- Patients have a right to request a transfer to another facility. We must inform the patient of the risks, benefits and alternatives that come with a transfer. Decisions directives regarding treatment options. We honor existing advance directives in accordance with the Hospital [Advance Directive Policy \(#21\)](#).

## **Grievances:**

- We respect the patient's opinion and provide a process for filing a grievance. See the [Complaint and Grievance Policy](#).

## **Emergency Medical Care (EMTALA)**

- SLUHN provides an emergency medical screening and necessary stabilization to all patients regardless of ability to pay.
- Anyone with an emergency medical condition is stabilized and treated as long as the Hospital has the ability to provide appropriate care.
- We do not delay the emergency medical screening and necessary stabilization in order to seek financial information.
- Patients with emergency medical conditions are transferred to another facility if the patient requests a transfer and if the patient's medical needs can not be met at here.
- The patient is transferred only if the receiving facility has agreed to accept the patient.
- Further information about the policy for Emergency Medical Treatment and Labor Act (EMTALA) can be found in the Emergency Department [Transfer Procedure Policy](#).

## **III. Workplace Conduct**

### **Harassment, Disruptive Behavior and Discrimination:**

**SLUHN does not condone or tolerate discrimination or harassment of any kind.**

- Employment is based on merit and experience. It is not affected by race, color, religion, ancestry, age, sex, nationality, sexual orientation, gender identity, disability, or genetic information.
- Sexual harassment is prohibited. Sexual harassment includes unwelcomed sexual advances or requests for sexual favors that affect employment. Sexual harassment includes, but is not limited to offensive comments, jokes, indirect suggestions and other sexually suggestive statements.
- Harassment also includes threats or actual verbal and physical assaults, robbery, stalking and crimes directed against an individual.
- SLUHN has "zero tolerance" for disruptive behavior, or for retaliation against an accuser or witness to any alleged disruptive behavior.
- Additional information can be found in the [Disruptive Behavior Policy](#).

**Weapons on St. Luke's Property:**

- Firearms, other weapons, explosive devices or other dangerous materials are not allowed on St. Luke's property. See St. Luke's policy on [Workplace Violence \(221\)](#).

**Report any incident of discrimination, harassment or disruptive behavior to a supervisor, manager, or Human Resources right away.** SLUHN will investigate all claims. If the claim is supported, SLUHN will take action to end the harassment. Reports of harassment will be kept confidential unless disclosure is necessary for the purpose of investigation or corrective action.

**Drugs, Alcohol Free Environment:** SLUHN is committed to improving the health of our patients and team members.

- SLUHN does not allow the use of a controlled substance by any employee, whether the unlawful drug activity occurs inside or outside the workplace.
- Off-the-job conduct involving alcohol and/or drugs can result in corrective action up to and including termination.
- Actions that negatively affect the employee's job performance or jeopardizes his or her safety or the safety of others will result in corrective action, up to and including termination.
- Conduct that negatively affects the public trust in the ability of SLUHN to carry out its responsibilities can result in corrective action, up to and including termination.
- Any employee on the job or on SLUHN premises who is involved in unauthorized possession or use of drugs and/or alcohol or is suspected of being under the influence will be suspended from work immediately. He or she will be taken for a fitness for duty exam and subject to corrective action, up to and including termination.

**Smoke-Free Environment:** SLUHN is committed to the promotion of health, which includes the prevention of disease as well as its treatment.

- Smoking by employees is not permitted in or on any of the grounds of Network owned or leased facilities.
- Smoking on adjacent properties and sidewalks creates a negative reflection on the image of St. Luke's and is also prohibited.

**Workplace Health and Safety:** Maintaining a healthy and safe workplace for patients, visitors, and members of the St. Luke's community is the responsibility of everyone.

- You should become familiar with how the safety rules apply to your specific job. Ask your supervisor or the Safety Officers when you have questions.

- You **must notify** your supervisor about safety hazards, broken equipment, a workplace injury or any situation presenting a danger of injury.

#### **Licenses and Certificates:**

- Team members, medical staff and independent contractors requiring licenses, certificates and other credentials to perform their jobs are responsible for maintaining the current status of their credentials.
- They shall comply with all federal and state requirements related to their discipline.
- The requirements to participate as a member of the medical staff can be found in the Medical Staff Membership section of the Medical Staff Bylaws. See the Licensing Policy (#220) for non-physician practitioners.

**Use of SLUHN Property and Equipment:** Each of us has a responsibility to protect and preserve the assets of SLUHN. This includes employee time, Network equipment, supplies, facilities, computer hardware and software, and information.

- You may not use or take any SLUHN assets without prior permission of your supervisor.
- Personal telephone calls should be limited to emergencies during working hours.
- Telephone and Internet access at work are not to be used to post, distribute, transmit, store or download any material that is obscene, threatening, discriminatory, or maliciously false.
- Abuse, misuse or deliberate destruction of Network property or equipment may result in corrective action, up to and including termination.

For additional information regarding Workplace Conduct, please refer to the Employee Handbook on My Net.

## **IV. Legal Compliance**

SLUHN is a complex organization whose conduct is regulated by federal, state and local laws. It is the policy of SLUHN to comply fully with the letter and spirit of these laws

#### **Legal and Regulatory Compliance (Fraud and Abuse):**

- SLUHN does not pay or offer to pay anyone, including St. Luke's team members, physicians or other entities, anything for the purpose of obtaining referrals.
- We do not accept payment for referrals.

- No SLUHN team member or anyone acting on behalf of SLUHN is permitted to solicit or receive anything of value, directly or indirectly, in exchange for the referral of patients.
- SLUHN prohibits billing for services not provided. SLUHN also prohibits billing for services coded at a level of service higher than actually provided. We also do not bill for services that are not covered by the insurance carrier or services that are medically unnecessary.
- SLUHN bills for services that are medically necessary correctly documented and coded.
- SLUHN reports all financial transactions according to accounting principles and Hospital policies and procedures.

You **are required** to report violations or suspected violations to your supervisor, a member of management or the Chief Compliance & Privacy Officer. You may report your concern anonymously on the Compliance Hotline at 1-855-9 ETHICS or 1-855-938-4427. You are protected under federal law from retaliation for reporting actual and suspected violations.

### **Political Activity**

SLUHN is a charitable tax exempt entity whose mission is to provide high quality health care to the communities we serve.

- SLUHN resources cannot be used to benefit an individual or group of individuals.
- SLUHN directors, senior managers, supervisory managers, team members, medical staff, volunteers or contractors may not contribute any SLUHN money, goods or services to any political candidate, party or organization.
- Team members may not perform political activities such as manning phone banks, distributing candidate fliers or preparing campaign material while they are being paid by SLUHN.
- SLUHN property may not be loaned or used for any political campaigning.
- Directors, managers, team members and volunteers are free to engage in political activities and contribute their time and money as private citizens and not as representatives of SLUHN.

### **Employment and Retention of Excluded Persons:**

- SLUHN will not knowingly employ, grant medical privileges to or contract with any person or entity that has been convicted of a criminal offense related to the provision health care services and items. SLUHN will not employ or contract with anyone excluded from or determined to be ineligible to participate in federal healthcare programs or has been barred from contracting with the federal government.

**Compliance with Environmental Regulations and Laws:** It is our policy to comply with all environmental laws and regulations that relate to the operations of our facilities.

- Your responsibility is to understand how your job impacts the environment. You must adhere to the policies and procedures for waste management and immediately report to your supervisor any situations involving discharge of a hazardous substance, improper disposal of hazardous material and medical waste or potential damage to the environment.
- Refer to the policy and procedure for [waste management](#).

**Retention and Disposal of Records:** A hospital as large as SLUHN creates many different types of records.

- We do not falsify facts or make false records.
- We create only those records that are necessary and required by law.
- We give records only to people who have a need to know and only to the extent necessary for them to perform their responsibilities.
- We retain records consistent with legal requirements.
- We dispose of records in accordance with SLUHN policies and procedures.
- All records containing sensitive information such as patient medical records, personnel files and financial and business records **are disposed of in a manner to ensure confidentiality**.
- Records must never be altered, falsified or destroyed in an effort to deny governmental authorities access to records that may be relevant to a government investigation.
- Under no circumstance may a director, manager, team member, member of the medical staff, volunteer or contractor use information found in patient, personnel or business records to personally benefit or engage in identity theft.

You must also know and follow the records retention and disposal policies and practices for your specific job. If you are not certain whether or not a record should be retained or disposed of, ask your supervisor or contact the Network Compliance Department at (610) 484-3288. Additional guidance regarding retention and disposal of records can be found in [Destruction of Medical Records \(#213\)](#) and [Retention of Hospital Records \(#176\)](#) policies.

## **V. Business and Financial Practices**

**Accurate Coding and Billing:** SLUHN bills the government, third party payers and patients for services and items that were provided. These services must be ordered by appropriate medical personnel and they must be medically necessary. The need for medical care must be documented in the medical record.

- SLUHN prohibits any team member or agent from knowingly creating or submitting claims for payment or approval that are false, fictitious or fraudulent.
- SLUHN monitors coding of claims for accuracy and makes immediate corrective action when errors are discovered.
- SLUHN does not excuse or accept falsifying information or documents. This includes making alterations that do not have a legitimate business purpose.
- It is your responsibility to ensure the accuracy and integrity of the documents and records you prepare.

If you think that claims are incorrect and have been billed, **you must** report it to the Chief Compliance & Privacy Officer at 484-526-3288 or call the Compliance Hotline at 1-855-9 ETHICS or 1-855-938-4487 or go online to [mysaintlukes.alertline.com](http://mysaintlukes.alertline.com). SLUHN does not allow retaliation against any employee who reports a valid concern. Individuals, who violate the retaliation policy, will receive corrective action according to company policy.

**Confidentiality of Personnel and Proprietary Information:**

- Salary, benefit and personal information about a team member is confidential. This information may only be accessed for business reasons.
- Confidential information covers many areas of SLUHN operations. It includes many subjects. Some of these subjects are patient lists and clinical data. Also included in this list is information pertaining to acquisitions, financial data, marketing strategies. Any proprietary computer software, purchasing contracts, and supplier and sub-contractor information is also confidential.
- We must always be aware of our surroundings when accessing confidential information. This is true especially with patient information. We are obligated to prevent unintended disclosure.
- You must avoid sending sensitive information outside SLUHN through the Internet or storing information on laptops or flash drives. This should not be done unless the information is encrypted and you can reasonably make sure that the storage devices will not be stolen, lost or misplaced.
- You must safeguard your password to information systems and not share it with anyone.

It is essential that each person with access to SLUHN information systems comply with all information security policies and procedures. It is our responsibility to maintain the confidentiality and integrity of information. We must make sure that we do not disclose it to others **unless the individuals have a need to know** the information in order to perform their specific job duties or carry out a contractual business relationship.

## **VI: PERSONAL AND BUSINESS RELATIONSHIPS**

**Conflicts of Interests:** A conflict of interest arises when your personal interests are different from the best interests of SLUHN. A conflict of interest may happen if an interest of a team member, member of the medical staff, manager or director influences or appears to influence work related decisions.

- Individuals affiliated with SLUHN may not use their position to profit personally. They may not assist others to profit at the expense of St. Luke's. As such, each owes a duty of undivided loyalty to SLUHN. A conflict of interest may also result from outside activities if these activities hinder or distract an individual from job duties.
- It is your responsibility to make sure that your personal interests and outside activities do not lead to a perceived conflict of interest.
- You must also disclose conflicts of interests to your immediate supervisor and the Chief Compliance & Privacy Officer. Your supervisor and the Chief Compliance & Privacy Officer will determine if there is a conflict of interest.

**Gifts:** It is the policy of SLUHN to avoid team members giving, soliciting or receiving gifts, favors or hospitality. These gifts include meals and entertainment that would influence or appear to influence decision making or actions affecting St. Luke's.

- Team members are prohibited from giving and receiving gifts of cash or its equivalents, including gift certificates, gift cards, stocks and coupons.
- Team members may accept gifts with a face value of no more than \$100.00 per calendar year.
- Meals and entertainment with a value of \$100.00 may be accepted provided the SLUHN team member and outside business associate are present and business is discussed.
- A detailed explanation of SLUHN gift policy can be found in the [Gifts and Entertainment \(#157\)](#) administrative policy.

**Relationships with vendors, suppliers, consultants and contractors:** It is the intent of SLUHN to create a level playing field when dealing with vendors, suppliers, consultants and contractors.

- We manage our purchasing relationships in a fair and reasonable manner. It is free from conflicts and consistent with applicable laws and good business practices.
- We select vendors using objective measurements. These may include quality, technical excellence, price and ability to meet delivery schedules. We do not make decisions based on personal relationships.
- We do not solicit or accept inducements to steer business to a specific vendors.
- We do not accept kickbacks from vendors for selecting them for SLUHN business.
- We do not rig bids to favor a specific supplier or disclose confidential information from a vendor to competitors unless required by law and authorized by the vendor and law.
- We do not knowingly do business with any contractor or supplier who has been barred or excluded from federal programs.
- Engaging in these practices and others deemed to be contrary to fair business practices will result in **disciplinary action, including termination of employment.**

**Relationships with Competitors:** SLUHN is bound by highly complex antitrust laws which govern our relationships with competitors. These laws are designed to promote fair competition. Antitrust laws could be violated by discussing with a competitor business matters. Included is the process for setting charges or marketing plans. Antitrust laws could also be violated by agreeing to allocate services or procedures in a particular geographic area or agreeing with a competitor to not deal with a particular vendor or payer.

- You should avoid any discussion of these matters with competitor's personnel in private discussions and public forums such as a professional meeting.
- You should also inform in writing the Legal Services Department of the incident.

**Relationships with Research Subjects:** We are committed without question to the safety and rights of the individuals who have chosen to participate in clinical research.

- SLUHN adheres to ethical standards and complies with all laws and regulations in any research. We also adhere to ethical standards and comply

with laws related to clinical and investigational trials conducted by our physicians and professional staff.

- SLUHN will not tolerate any research misconduct. Misconduct includes coercing patients, plagiarism or taking credit for another’s work or falsifying research results.
- Persons committing these violations shall be investigated and disciplined in accordance with the policy, [Inquiry and Investigation Process to Address Allegations of Research \(# 181\)](#).

**Relationships with Government and Public Officials:** The federal and state government has strict rules regarding the giving of gifts, meals and other business courtesies to their employees.

- It is the policy of SLUHN to not offer or give anything of monetary value. The list includes gifts, gratuities, favors, entertainment. We refrain from offering these items to any elected official, employee, and representative of a government agency that SLUHN has a business relationship with. We also refrain from offering these items to any agency that regulates any SLUHN operations or activities.
- We may provide minor refreshments, such as a cup of coffee, during the course of business discussions. We will only do this if allowed by law and the regulations of the governmental agency.

## **VII: SLUHN COMPLIANCE PROGRAM**

The mission of the SLUHN Compliance Program is to ensure that SLUHN team members “do the right thing”. Some may ask, just what is the “right thing”?

- It is working together everyday, respectfully and diligently, to provide comfort, compassion, guidance and expertise to those we serve.
- It is recognizing that we have a duty to act as responsible stewards of resources entrusted to our care.
- It is conducting our personal and business affairs in a lawful manner.
- It is being a good corporate and private citizen.

The structure of the SLUHN Compliance Program is designed to ensure a continual compliance presence throughout the organization.

- The Audit and Compliance Committee of the Board of Directors provides guidance, direction and oversight to the Compliance Program.
- The Chief Compliance & Privacy Officer (CCPO) is responsible for the day-to-day operation of the Program.
- The CCPO develops the annual compliance work plan, chairs a corporate compliance committee, and implements a corporate-wide training program.

- The CCPO also maintains the Compliance Hotline and directs responses to team members' inquiries and messages.
- The Network Compliance Department coordinates and conducts investigations to resolve compliance issues. This department performs reviews and audits of SLUHN operations to assess compliance with policies and federal and state requirements.
- The Network Compliance Department has working knowledge of relevant issues, laws and regulations relating to compliance and also conducts compliance training.

Compliance functions for St. Luke's Physician Group (SLPG), HomeStar Medical Equipment, St. Luke's Emergency Transport Service (SLETS) and St. Luke's Visiting Nurse Association (SLVNA) are performed internally and coordinated by the CCPO.

Each person affiliated with SLUHN has an individual responsibility to report any activity that appears to violate applicable laws, rules, regulations the SLUHN Code of Conduct, and SLUHN policies

- to your supervisor, or Human Resources
- to the Chief Compliance & Privacy Officer at 484-526-3288 or
- to the Compliance Hotline at 1-855 9 ETHICS or 1-855-938-4427
- to the Compliance website [mysaintlukes.alertline.com](http://mysaintlukes.alertline.com)

SLUHN will make every effort to maintain your confidentiality within the limits of the law.

- You will not be subjected to retaliation or discipline for reporting a violation made in good faith.
- You will be disciplined for deliberately making a false accusation for the purpose of harming or retaliating against another team member.
- You are encouraged to report matters that pertain to employment to your supervisor and Human Resources.

SLUHN is committed to investigating all reported concerns. The Chief Compliance & Privacy Officer will coordinate all findings recommend corrective action or needed changes.

- All persons affiliated with SLUHN, including members of management, shall cooperate fully with investigations.

When an investigation determines that a violation of the law, SLUHN policy or this Code of Conduct has occurred, SLUHN shall implement immediate measures

to correct the violation and prevent its from happening again. Corrective measures may include:

- education,
- repayment
- self-disclosures to federal and state officials
- Corrective action, including termination of employment.

## **VIII: CONCLUSION**

The SLUHN Code of Conduct reflects who we are as members of this community and how we should conduct ourselves in our dealings with the individuals who seek our services. The SLUHN Code of Conduct explains how we deal with the governmental functions that regulate the provision of these services, and how we interact with outside parties whom we purchase resources from. Most importantly, it reflects how we deal with each other.

**We conduct ourselves in a lawful and ethical manner.** After all, an ethical, honest workplace really does begin with you.

If you have any questions or comments regarding “The Code”, please contact the Chief Compliance & Privacy Officer at 484-526-3288 or by calling the toll-free, confidential Hotline at 1-855-938-4427, or by going on line to the confidential website [mysaintlukes.alertline.com](http://mysaintlukes.alertline.com).