

St. Luke's Code of Conduct

Act with Integrity



Ethics

Patient Safety

Quality

Service



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"Thank you for your commitment to

Act with Integrity

and living our mission, vision and values. We appreciate the great work you do every day to make a difference for those we serve."



Our Message to You

At St. Luke's University Health Network, we are deeply committed to honest and ethical behavior and will always "Act with Integrity" when serving our patients and conducting our business. The practice of behaving honestly, ethically and with integrity is an individual responsibility of everyone who works for St. Luke's. Our practice of doing what is right, even when no one is looking, is ingrained in our culture and evident in everything we do.

Understanding and following our Code of Conduct is one important way we demonstrate our commitment to honest and ethical behavior. The Code is an essential element of our Compliance Program and can be used as a guide for making the right decisions in the complex healthcare environment in which we work. Using the Code helps us maintain our standards of excellence and "Act with Integrity" as we deliver compassionate and high-quality care.

We want you to feel comfortable asking questions or seeking advice about the Code, the Compliance Program or any of our policies, rules, or guidelines for ethical behavior, business practices or safety. Your manager, your Human Resources Director or designee, and our Network Compliance Department (NetworkCompliance@sluhn.org) are all available to help. You may also report concerns anonymously using our Hotline at 1-855-9ETHICS (1-855-938-4427) or online at sluhn.org/compliance.

Thank you for your commitment to act with integrity and living our mission, as well as sharing in our vision and values each day. We appreciate the great work you do every day to make a difference to those we serve.

Sincerely,

A handwritten signature in black ink that reads "Richard A. Anderson".

Richard A. Anderson
President & CEO



Using our Code of Conduct

Our Code provides guidance for conducting business and providing patient care in a manner that helps us achieve our mission, vision and values. We follow regulatory standards and requirements in all our patient engagements and business activities. In many cases, the Code helps us comply with these standards. Also, by using the Code, we show our patients and the community that we are committed to ethical and honest behavior.

The Code complements our St. Luke's Compliance Program by including important information about our policies, legal requirements and business practices. It is a tool to help you do the right thing and act with integrity. The Code is distributed to new hires at the time of onboarding and to all employees annually during general compliance training. Each of us should read, understand, and follow the Code.

Questions?



Q: Who is expected to understand and follow the St. Luke's Code of Conduct?

A: *Our Board of Trustees and its committee members, as well as all employees, physicians, caregivers, contractors, vendors, business partners and volunteers.*

St Luke's Mission, Vision and Values

Our Mission

St. Luke's Mission is to care for the sick and injured regardless of their ability to pay, improve our communities' overall health, and educate our health care professionals.

Our Vision

We will:

- Achieve top decile performance in national quality measures
- Provide exceptional service and cost-effective care
- Be perceived as easy to use by all who access or provide our services
- Be one of the region's best places to work

Our Values

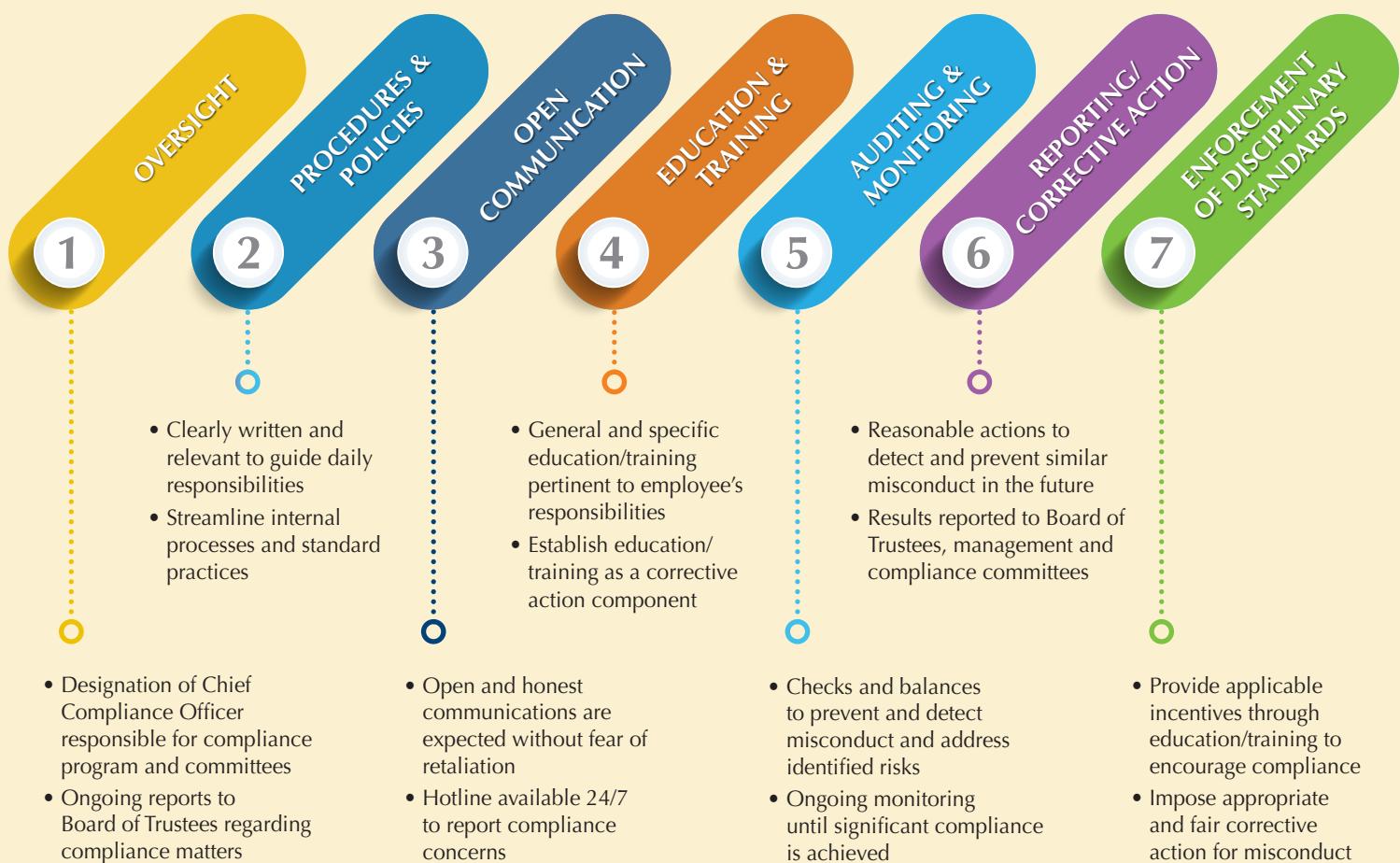
PCRAFT values are the guiding core principles of St. Luke's health care team, the qualities we strive for with every encounter. Pride, caring, respect, accountability, flexibility and teamwork are the qualities our team will deliver every time.

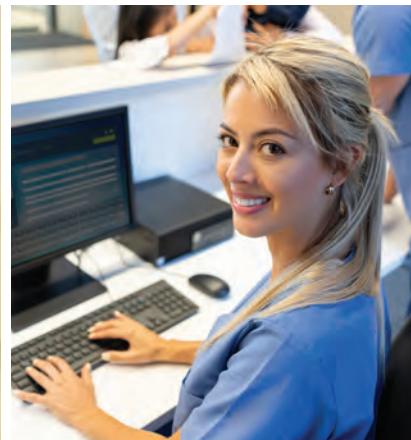


St. Luke's Compliance Program

INTRODUCTION TO THE COMPLIANCE PROGRAM

The federal government has determined that there are seven elements of an effective compliance program. Our compliance program includes these elements and thereby supports ethical decision-making and compliance with policies and regulations related to billing, finances, patient safety and quality of care. We recognize that an effective compliance program touches our every decision and action. Here is a brief description of the seven elements for your reference.





Reporting Concerns



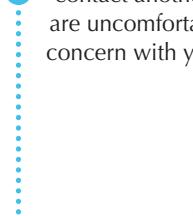
At St. Luke's, we are committed to transparency. We have an open-door policy that allows all employees to communicate openly and honestly without fear of retaliation. We want you to feel free to ask questions, seek clarification and promptly report any concerns or misconduct when they happen.

If you have a work place concern, or if you believe there have been potential violations of rules, policies, laws or our Code you should report it. All reports will be reviewed and investigated, if necessary. You may contact any of the resources noted in the diagram below.

For more information about this subject, employees should refer to our Reporting of Potential Compliance Issues Policy (COMP – 2) and Non-Retaliation Policy (#253).

SUPERVISOR OR MANAGER

Best resource to resolve your concern quickly. You can contact another leader if you are uncomfortable raising the concern with your supervisor.



ST. LUKE'S COMPLIANCE HOTLINE

at 1-855-9ETHICS (1-855-938-4427) or sluhn.org/compliance.

The hotline is operated by an independent third party and is available 365 days a year (24/7). Confidential and anonymous reporting is available.

HUMAN RESOURCES DIRECTOR, OR DESIGNEE



NETWORK COMPLIANCE DEPARTMENT

NetworkCompliance@sluhn.org



St. Luke's Compliance Program Culture



Compliance Mission

To promote a culture that encourages ethical conduct and a commitment to the prevention, detection and correction of illegal behavior within our organization.



Compliance Vision

To be a trusted partner in fostering integrity, collaboration, accountability and a culture of compliance that protects the Mission, Vision and Values of St. Luke's.

Guiding Principles

INTEGRITY

We demonstrate fairness, honesty and ethical behavior in our service to the organization.

OBJECTIVITY

We perform duties in an unbiased manner based on an informed analysis of the issues and a clear understanding of the operations affected.

COLLABORATION

We work collaboratively to provide reliable and consistent services that will support the organization's ability to fulfill its mission.

OPEN COMMUNICATION

We foster a culture of transparency and responsible reporting through promoting open and honest communication among all individuals throughout the organization.

Strategic Priorities

RISK INTELLIGENCE

Gather information to evaluate governance, risk and compliance issues.

STRATEGIC BUSINESS PARTNER

Compliance will serve as an internal advisor for key organizational initiatives, including due diligence when acquiring new entities, new entity integration and strategic planning.

DATA ANALYSIS

Utilize data and technology capabilities to enhance data analytics efforts within the Compliance Program.

Understanding Your Responsibilities



We share the responsibility to prevent wrongdoings in the workplace. We also must hold ourselves accountable for our own behavior and actions. We know that reporting suspected non-compliant behavior or violations of policies/laws requires courage. You can feel comfortable knowing that prompt reporting or seeking immediate guidance enables us to address potential illegal or unethical conduct as it occurs.

WE CREATED THE DECISION TREE BELOW FOR YOU TO USE AS A GUIDE WHEN YOU ARE FACED WITH AN ETHICAL DILEMMA.



- If your answer to any of these questions is “no”... then don’t do it!
- If you are unsure how to respond to a particular situation, you can use the St. Luke’s reporting options on page 4.

Workplace Integrity

Workplace integrity involves a moral, ethical, honest and fair environment. Each of us must lead by example by acting in the best interest of our patients, business partners and communities that we serve. We want people to trust that we are treating patients and conducting business the right way.

St. Luke’s PCRAFT values describe the behavior expected of us by the people we serve and interact with daily. These values also complement our Compliance Program structure, as follows:





Confidential Information

We must always keep proprietary information about our patients, co-workers and St. Luke's confidential. Sharing this information can harm our patients and employees, as well as compromise the business and mission of St. Luke's.

HIPAA Requirements

The Health Insurance Portability and Accountability Act of 1996 (HIPAA) is a federal law that requires us to keep patients' protected health information (PHI) safe and confidential. Employees, providers and other health care partners are generally permitted to share PHI without patient authorization only for treatment, payment and healthcare operations.

- We do not share patient information unless we have the patient's authorization or are required or allowed to by law.
- We are only permitted to access a patient's health record when we have a current, legitimate, work related need to do so.
- St. Luke's has the ability to audit and monitor HIPAA Privacy and Security violations of the electronic health record (EHR).

Q: In the break room, I heard my manager discussing the condition of a physician's spouse who is receiving treatments at our hospital. What should I do?

A: *The PHI of physicians and their families must be kept confidential, just like any other patients. Discuss the issue with your manager or use St. Luke's reporting options listed on page 4.*

Q: One of my family members is in the intensive care unit. May I look at her medical information to let other family members know how she is doing?

A: *No. You are required to follow the same process as any person who does not work for St. Luke's. This means contacting the Health Information Management Department, formerly the Medical Records Department, to obtain the records.*

Employee Information

We keep employee personnel information confidential by following Human Resources policies as well as federal and state laws. Employee information includes wage and salary information, employment history and status, Social Security numbers and financial and banking information.

Q: I work in payroll. A friend who also works at the hospital is being promoted to a management position. He asked me how much other managers are making. Can I share this information if I do not give specific names?

A: *No. You must keep employee information confidential and may not share it with anyone who does not have a legitimate business purpose for accessing the information.*

Confidential Business Information

We must always keep St. Luke's proprietary business information confidential. This information must be protected and shared only with employees who require the information to perform their job responsibilities.

Q: A friend who works for a competitor asked me to share information I learned through my position at St. Luke's. Should I share this information?

A: *No. Do not share information learned through your job at St. Luke's. It is inappropriate and unethical to share our confidential information with anyone else.*



Employee Rights and Responsibilities

Employee Rights

St. Luke's is committed to providing a professional work environment in which all employees are treated fairly and with respect and dignity. This commitment to a culture of respect is manifested in St. Luke's policies and practices. In addition, there are several applicable labor and employment laws governing our conduct, such as those dealing with privacy, immigration and wages, and those prohibiting employment discrimination and harassment. It is our collective responsibility to create a professional work environment in which everyone is treated with respect and dignity. Important policies are highlighted here:

- Right to be free from discrimination and harassment because of membership in a protected class. See the Equal Employment Opportunity (EEO) and Harassment Policies in the Employee Handbook;
- Right to a safe workplace free of dangerous conditions and safety hazards. See the Safety & Security Policy in the Employee Handbook and Workplace Violence Prevention Policy (#53);
- Right to be free from retaliation for filing a claim or complaint against an employer. See St. Luke's EEO and Harassment Policies in the Employee Handbook and Non-Retaliation Policy (#253); and
- Right to pay for all hours worked (including overtime) and equal wages for equal work performed. See EEO, Overtime and Time and Attendance Policies in the Employee Handbook.

In addition, St. Luke's Work Rules, EEO and Harassment Policies prohibit discrimination, harassment, violence, bullying or other abusive conduct.

Furthermore, St. Luke's has "zero tolerance" for disruptive behavior and for any form of retaliation against a complainant or witness to alleged disruptive behavior. See the Disruptive Behavior Policy (#210)

for more details. This "zero tolerance" for retaliation extends to any complaints of discrimination, harassment or other concerns brought forward in good faith.

As a matter of responsibility, St. Luke's employees are expected to conduct themselves in a professional and respectful manner consistent with our Policies, Work Rules, Mission, Vision and Values.

Conflicts of Interest

A conflict of interest happens when your outside activities have the potential of making it difficult to do your job the right way. It is important that we avoid situations that conflict, or could have the appearance of conflicting, with our jobs at St. Luke's. All employees must let their manager know if they have a possible conflict of interest situation.

Conflicts of interest can occur in a variety of ways. The following situations can be considered conflicts of interest and should be carefully analyzed:

- Doing business on our behalf with family or close friends.
- Hiring consultants, agents and other third parties with whom you have a personal relationship.
- Accepting entertainment or gifts from people or entities we do business with.

Outside Interests and Activities

If you have any type of employment or consulting relationship with an outside organization that does business with, or is affiliated with, St. Luke's, the situation must be discussed with, and reviewed by, your manager. You also should consult with St. Luke's Legal Services or Network Compliance Departments for final approval of the relationship. It is important to ensure a conflict of interest does not exist.

Any outside consulting or other business that you perform must be on your own time. These activities must not conflict with, or affect, your work schedule and/or performance. See Professional Ethics and Outside Work





Activities Policies in the Employee Handbook.

Q: I am an employee of St. Luke's. To earn extra money, I sell nutritional supplements and skincare products. Can I advertise my business via St. Luke's email or post an advertisement on the bulletin board in my department?

A: *No. St. Luke's is a charitable, tax-exempt organization; therefore, activities that are not related to charitable purposes put the organization at risk of financial penalties or, in extreme cases, loss of tax-exempt status.*

Social Media

Responsible social media use by everyone who works for St. Luke's is extremely important. Your communications on social media should reflect St. Luke's in a positive way. If you say you are associated with St. Luke's, make it clear that your views are your own and not those of St. Luke's.

Employees may not share confidential information about St. Luke's, our patients, or our employees on social media. You may not take photographs or recordings of patients, visitors, or staff in the workplace or of any equipment that displays confidential information. See the HIPAA-Photography and Audio-Visual Recording Policy (#204). For more information on the above social media expectations, see the Social Media Policy in the Employee Handbook and the Social Media Policy (#268). You should utilize the reporting options listed on page 4 for any questions concerning the appropriate use of social media and technology.

Compliance Reporting Guidance

We take responsibility for our actions as individuals and as an organization by reporting possible compliance issues in an honest, timely and accurate manner and by maintaining transparent records. To help guide you on what you are responsible for reporting, see the box on the right for a list of examples (not all inclusive):

Reporting Examples

- Billing/coding concerns
- Compensation arrangements with business sources
- Conflict of interest concerns
- Contractual relationship concerns
- EMTALA concerns
- Falsification of records
- Fraudulent activities
- Gifts to/from business sources
- Harassment or other discrimination based on membership in a protected class
- Improper or incorrect documentation for billing
- Inappropriate disclosure of confidential information
- Inappropriate payments to referral sources
- Medically unnecessary services provided to patients
- Misuse of St. Luke's assets
- Non-compliance with the Code of Conduct and other compliance policies
- Potential hazards and unsafe conditions
- Real estate lease arrangements with business sources
- Suspected identity theft
- Tax exempt status concerns
- Other activities that may violate federal, state or local law, statutes, regulations, guidelines, or rules that govern the health care industry



Billing and Financial Practices

Billing and Coding

There are many billing and coding regulations that we must follow when billing for services and products provided to patients. Billing and coding must be done accurately and timely in order to receive proper payment. Also, our documentation must accurately reflect that the services ordered and performed are medically necessary based on the patient's medical condition.

Employees should be aware of potential billing and coding compliance concerns such as upcoding, unbundling and billing for services not ordered or performed and/or not medically necessary. You should notify your manager or the Network Compliance Department if you have any billing, coding or documentation concerns.

Q: If documentation is not available when we are ready to submit a bill, is it okay to submit the bill?

A: *No. Do not submit a bill until appropriate documentation is on file. This verifies that the services were provided to the patient.*

Workplace Conduct

Protection and Proper Use of St. Luke's Assets

Each of us has a responsibility to protect and preserve the assets of St. Luke's. Our financial resources, equipment, supplies, time and reputation are examples of assets we must protect. We do this by making good decisions that help keep our assets safe and make sure they are used appropriately.

Being responsible with our assets and resources means that we:

- Keep accurate and reliable financial records and reports.
- Make sure that St. Luke's assets are used to further its health care mission, not for personal business.
- Do not use St. Luke's time, equipment, supplies, materials or services for unauthorized purposes.
- Follow St. Luke's Employee Handbook (including but not limited to the Work Rules), Code of Conduct and other policies and procedures such as:
 - Acceptable Use Policy (#246)
 - Gifts and Entertainment Policy (#157)
 - HIPAA – Workstation Use & Security (#206)
 - Purchase of Supplies, Equipment and Purchased Services (#65)
 - Social Media Policy (#268)

Employees are encouraged to use St. Luke's reporting options on page 4 if they have questions about the proper use of our assets.

Use of Sensitive Data

Employees must handle sensitive data with care. All individuals need to be familiar with St. Luke's Acceptable Use Policy (#246), which outlines the security policies that employees agree to follow upon hire. The HIPAA – Workstation Use & Security Policy (#206) is also an excellent resource. Key components of these policies include:

- Individuals may not export information to thumb drives/hard drives without the appropriate permissions.
- Individuals may not email any patient or company information to external emails without a job related need. If you must send PHI or company information for business purposes, the email must be encrypted.
- Individuals must adhere to St. Luke's computer security requirements. Examples include locking computer screens, using complex passwords and not displaying passwords to others.



Non-Retaliation

Our policy prohibits retaliation against anyone who, in good faith, makes a report, raises a concern and/or participates in handling or investigating a concern regarding an actual or suspected violation of the Code, our policies or applicable laws. Our compliance culture promotes an atmosphere where employees should feel safe and comfortable asking a question or raising a concern without the fear of retaliation. We stress that employees should never engage in any form of retaliation, such as demotion, suspension, threats, harassment or termination. Also, employees should not allow retaliation by others. Keep in mind, an allegation of wrongdoing, waste and/or retaliation does not exempt an employee from meeting the expectations and requirements to perform his/her job.

St. Luke's will make every effort to keep your concern as confidential as possible under the particular circumstances while still ensuring St. Luke's ability to conduct an appropriate investigation. For more information about this subject, employees should refer to our Employee Handbook (e.g. Harassment Policy, Corporate Compliance Anti-Fraud Enforcement and Whistleblower Protections) and Non-Retaliation Policy (#253). If you believe you have been retaliated against for raising a concern, immediately report this using the reporting options shown on page 4.

Harassment/Disruptive Behavior

St. Luke's does not allow harassment of any kind. St. Luke's does not exclude, deny benefits to or otherwise discriminate against any person on the grounds of age, race, color, national origin, religion, sex, sexual preference, gender identity and expression, disability, or on the basis of source of payment or ability to pay. For more information about this subject, employees should refer to our Employee Handbook (e.g. Equal Employment Opportunity and Harassment Policies). The procedure for raising a concern and assurances of an investigation, non-retaliation and confidentiality are included in those policies.

Examples of prohibited behavior include making:

- Ethnic jokes
- Racial slurs
- Requests for sexual favors
- Sexual advances or suggestions
- Threats or intimidating remarks

As previously mentioned, St. Luke's also has "zero tolerance" for disruptive behavior or for retaliation against someone who reports disruptive behavior. See the Employee Rights and Responsibilities section of the Code on page 8 for more information.

Workplace Violence

St. Luke's is committed to providing a safe work environment free from threat or harm. Immediately report any physical assault, threat, intimidation, or property damage to your supervisor or use the reporting options shown on page 4. Guns, weapons, explosive devices, or other dangerous materials are not allowed on St. Luke's property, except by law enforcement who are on duty. For more information about this subject, employees should refer to our Employee Handbook (e.g. Workplace Violence Policy and Work Rules) and Workplace Violence Prevention Policy (#53).

Drug, Alcohol and Smoke Free Environment

St. Luke's employees, physicians, contractors, and vendors may not be under the influence of alcohol or illegal drugs on St. Luke's property, in St. Luke's vehicles and/or during work time. Employees are required to report any situations where St. Luke's personnel or its business partners appear to be under the influence of drugs or alcohol on St. Luke's properties. Off-duty drugs and/or alcohol-related conduct that adversely impacts the employee's performance and/or the public's trust and confidence in St. Luke's personnel also may result in appropriate remedial action up to and including termination of employment or contractual relationship. For more information about this subject, employees should refer to our Employee Handbook (e.g. Drug/Alcohol Free Environment, Fitness for Duty and Work Rules) and Fitness for Duty Policy (#82), which include instructions on how to report a concern of an employee who appears to be under the influence of alcohol or drugs.

Smoking is prohibited on the grounds of St. Luke's owned or leased facilities. For more information about this subject, employees should refer to our Employee Handbook (e.g., Work Rules, Tobacco-Free Environment) and Smoking Policy (#39).

Diversity and Inclusion



At St. Luke's, we respect each other and embrace individual differences. Each person brings unique and valuable perspectives, skills and experiences to their role and to St. Luke's. When we include everyone as part of the team, we enhance our communication and can more effectively solve difficult and complex problems. We expect all individuals to be open to asking questions, listening and considering the contributions of others to be an effective team member.

We all play an important role in creating a work environment in which employees and business partners feel valued and respected. We promote diversity and inclusion when we:

- Respect the diversity of each other's talents, abilities and experiences
- Actively listen and value the input of others
- Create an atmosphere of trust, openness, and honesty



By embracing diversity and inclusion, we are able to better serve our patients and our community.



Service to Our Patients

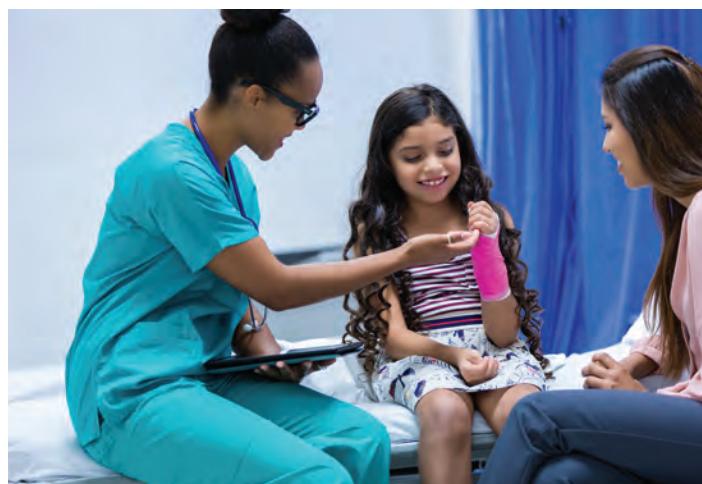
Patient Rights & Responsibilities

We recognize that patients put their trust in us when they choose to seek care with St. Luke's. We listen to our patients, value their input and protect their rights to privacy and confidentiality. Our patients have the right to receive excellent, compassionate, high quality, patient-centered healthcare that complies with laws and regulations.

We serve all our patients without regard to age, race, color, national origin, religion, sex, sexual preference, gender identity and expression, disability, or on the basis of source of payment or ability to pay. We treat every patient based on their needs with dignity and respect.

All patients and their representatives must be given appropriate confidentiality, privacy, advocacy, safety and an opportunity for pastoral or spiritual care. They must also be provided options for filing and resolving complaints, as well as access to an interpreter when the patient does not speak English or has a disability requiring assistance.

We respect the right of every patient to make informed decisions about his or her healthcare. Patients or their representatives should be provided information, in layman's terms, regarding diagnosis, treatment plan and prognosis, including alternative treatments and possible complications.



St. Luke's also provides information about advance directives and an explanation of the risks, benefits, and alternatives associated with the treatment plan. Lastly, patients have a right to information about their discharge plan, as well as a detailed explanation about their bill.

Q: How can I help a patient and/or family member get the information they need to make informed decisions?

A: *First, you must ensure the family member is authorized to receive information about the patient's condition. Then, work with your team to make sure all information and documentation is provided in an easy-to-understand format. Always allow time for questions and clarification. Listen to and respect patients' decisions regarding care, consent for treatment, managing pain and changing or withdrawing treatment.*

EMTALA

The Emergency Medical Treatment and Active Labor Act (EMTALA) requires that hospitals provide a medical screening examination (MSE) when a request is made for examination or treatment for an emergency medical condition (EMC), including active labor, regardless of an individual's ability to pay. Hospitals are then required to provide stabilizing treatment for patients with EMCs. If a hospital is unable to stabilize a patient within its capability/capacity or if the patient requests a transfer, then, a physician will certify that an appropriate transfer is necessary after the patient has been informed of transfer risks and benefits. For more information about this subject, employees should refer to the EMTALA – Medical Screening Examination and Stabilization Treatment Policy (#241).



Research

St. Luke's is committed to providing our patients and community with the best care and to advancing medical practice and technologies through quality research and innovation. The St. Luke's Institutional Review Board (IRB) is a standing committee empowered to protect the rights and welfare of individuals recruited to participate in human research activities through St. Luke's. We participate in research through several departments. Our research staff and those health care professionals conducting research remain knowledgeable about research regulations, as well as guidelines for clinical research included in the St. Luke's IRB Policies and Procedures Manual.

We are committed to the highest standards of ethics, honesty and integrity when conducting clinical research. St. Luke's will not permit research misconduct including:

- Inappropriately modifying study results
- Copying results from other studies without performing the clinical research
- Failing to identify potential research related conflicts of interest
- Failing to follow the guidelines set forth in the IRB Policies and Procedures Manual
- Conducting research without IRB's approval, when required.

Research Billing Compliance

St. Luke's will document timely and accurately, then bill for the research services rendered according to all applicable policies, laws and regulatory requirements. Patients are notified of potential non-covered costs prior to their enrollment in a study. Our employees are not allowed to knowingly present, or cause others to present, claims for payment or approval which are inaccurate, false or fictitious. We will report and return all self-identified overpayments as required by law.

Patient Safety

St. Luke's continuously strives to provide a safe environment to all our patients and promotes a culture of patient safety. Employees who witness an injury, accident or a dangerous situation should immediately report it to their supervisor and utilize the electronic "Patient Safety Event Reporting System," which is accessible to all employees on MyNet. Also, the Patient Safety Hotline is available 24 hours a day, seven days per week to report situations involving potential, actual or suspected patient harm.

Patient Safety Hotline: (484) 526-4044

Quality of Care

St. Luke's is dedicated to providing high quality care for all our patients. We are committed to following all laws, rules and policies relating to quality of care and patient safety. We always strive for the highest standards of care, report patient safety concerns, promote evidence-based practices and conduct quality improvement activities.

Complaints & Grievances

Our patients' feedback is important to us. We respect each patient's point of view and always encourage our patients and their families to report their observations and concerns. Patients can report a complaint or grievance in person, online or by phone. St. Luke's has a process to promptly investigate and resolve reported patient concerns. For more information about this subject, employees should refer to our Complaint and Grievance Resolution Policy (#2).

Documentation Standards

St. Luke's documentation standards ensure we convey accurate, essential information about finances, clinical treatment, therapeutic services and patient diagnosis. We follow all applicable federal and state laws that guide us on specific documentation requirements with the understanding that unclear, vague or absent documentation can result in patient safety errors, claim denials or recording inaccurate transactions on our financial statements.

We utilize documentation as a form of communication which should be accurate, objective and timely. Various individuals rely on documentation integrity to ensure we are treating the correct patient, providing treatment plans that are medically necessary and billing appropriately for services rendered to the patient. We will correct documentation errors according to our policies and applicable laws, as well as provide additional education about documentation requirements and expectations, where applicable. To report documentation that needs to be corrected, employees should refer to the Epic tip sheets for requesting a chart correction or merge. We will report improper payments due to documentation errors to management, and third parties; then, we will return overpayments to third party payors no later than 60 days after the investigation has been completed.

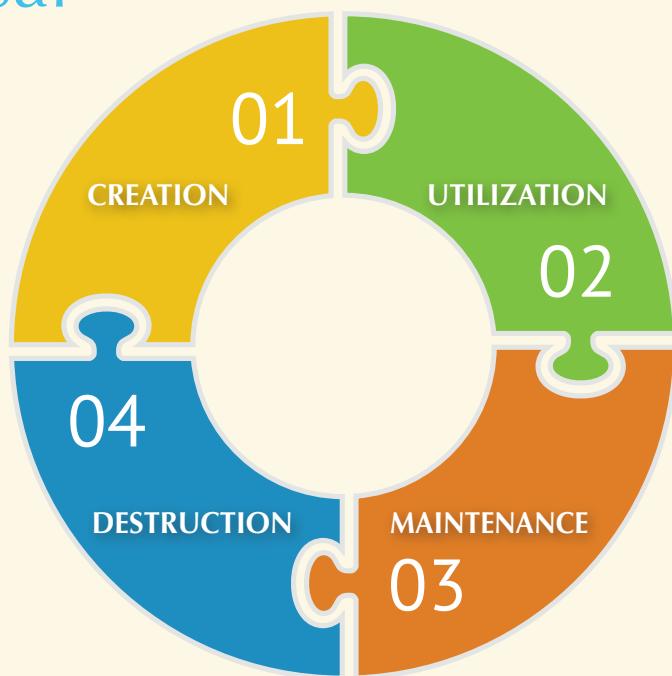
Financial and Business Records

Financial and business records such as cost reports, payroll records, expense reports and other documents must be accurate and truthful. We comply with legal and regulatory requirements, such as tax and financial reporting, to ensure the integrity of these records.

Record Retention/Disposal

St. Luke's will retain all records necessary for business and compliance reasons and dispose of them at the appropriate time in accordance with our record retention policies, as well as applicable federal and state requirements. A record is broadly defined to include any recorded information, regardless of format or media, including, but not limited to, documents, medical records, papers, photographs, microfilm, x-rays, drawings, charts, cards, and audio or video recordings that are generated and/or received in connection with St. Luke's business.

All records containing sensitive information such as patient medical records, personnel files and financial and business records will be disposed of in a manner to ensure confidentiality. Records must never be altered, falsified or destroyed to deny governmental authorities or others access to records that may be relevant to an internal or external investigation. See our Retention of Hospital Records Policy (#176) for more information.





Medical Records

Documentation helps to assess the quality of care provided to the patient and determines accurate billing and reimbursement for those services. A medical record should be prepared and maintained to communicate information clearly, concisely, completely and promptly about the services rendered to the patient. Employees are required to be familiar with the documentation requirements for their role based on policies and procedures, medical staff bylaws, or accreditation standards. This understanding will guide employees and assist them with maintaining complete and accurate medical records of each patient. Employees should keep in mind that they are also responsible for protecting the information noted in the medical record from breach of confidentiality or loss. If employees notice documentation errors or inaccuracies, they should report their concerns immediately. You may contact any of the resources on page 4 to report your questions or concerns.

Q: An employee works in a provider's office and assists with the billing. She notices that a patient, who was a no show, has a note in the chart from the provider and the office visit was billed. Should she be concerned?

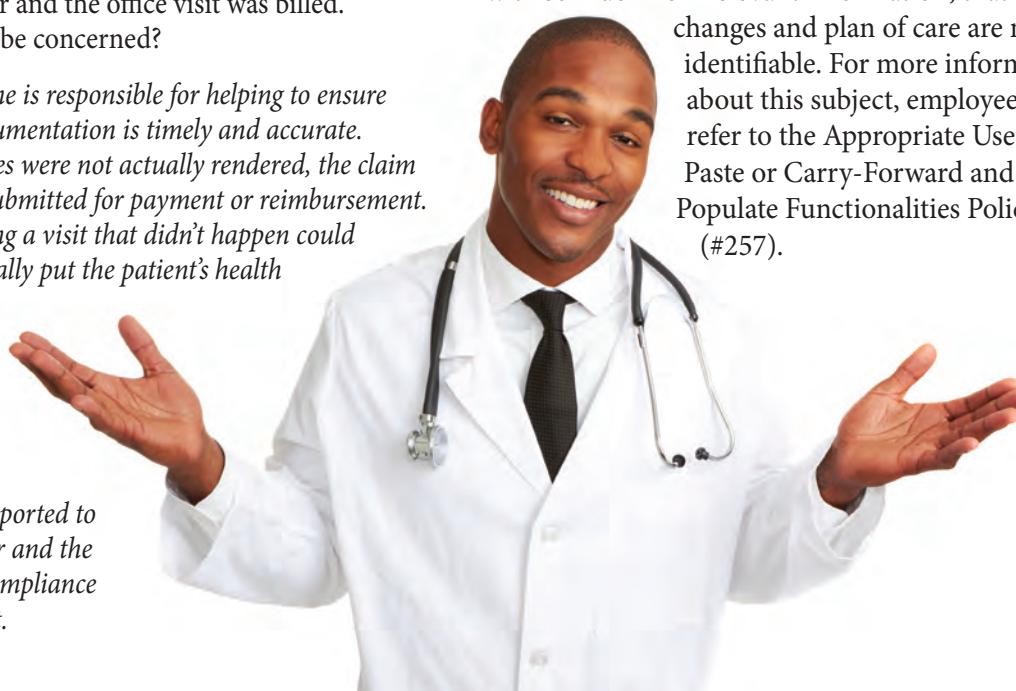
A: *Yes. Everyone is responsible for helping to ensure that all documentation is timely and accurate. If the services were not actually rendered, the claim cannot be submitted for payment or reimbursement. Documenting a visit that didn't happen could also potentially put the patient's health at risk since the information is inaccurate. The concern should be reported to the manager and the Network Compliance Department.*

Copy/Paste

Our goal is for employees and providers to create accurate and concise medical records that facilitate patient safety, quality care and appropriate billing for healthcare services. St. Luke's Electronic Health Record (EHR) is designed to help make patient care more efficient. The EHR contains several features that allow the use of templates, macros and copy/paste functionality that can streamline the note writing process. However, EHR users must review and edit all documentation populated by these features. They must remove data that does not accurately reflect the services provided and add or update any new information or information that has changed.

Incorrectly utilizing these features can create notes that lack current, accurate information, which does not support medical necessity. We cannot bill for services that do not have clear documentation of the medical necessity for such services. Incorrect use can also lead to "note bloat." This occurs when the note is populated with so much non-relevant information, that the current

changes and plan of care are not easily identifiable. For more information about this subject, employees should refer to the Appropriate Use of Copy/Paste or Carry-Forward and Auto Populate Functionalities Policy (#257).



Legal and Regulatory Compliance

St. Luke's is subject to federal and state laws designed to prevent fraud, waste, and abuse (FWA) in government programs, such as Medicare and Medicaid, and private insurance. "Fraud" is defined as the wrongful or criminal deception intended to result in financial or personal gain. Fraud includes false representation of fact, making false statements, or concealment of information. "Waste" is defined as the thoughtless or careless expenditure, mismanagement, or abuse of resources to the detriment (or potential detriment) of the government. Waste also includes incurring unnecessary costs resulting from inefficient or ineffective practices, systems, or controls. "Abuse" is defined as excessive or improper use of a thing, or to use something in a manner contrary to the natural or legal rules for its use. Abuse can occur in financial or non-financial settings.

In the healthcare setting, a hospital's receipt of referrals from a provider in exchange for something of value is subject to scrutiny and may be unlawful. St. Luke's does not allow its employees to consider the value or volume of referrals, nor other business generated between St. Luke's and third parties, when determining whether to enter into business arrangements or setting the compensation to be paid or received by St. Luke's. All agreements for payment or receipt of money, goods, services or anything of value with providers must comply with applicable laws.

Employees and business partners who report suspected violations of federal and state laws are entitled to whistleblower protections including protection from retribution or retaliation from St. Luke's management. This section will provide an overview of some key FWA laws.

Anti-Kickback Statute

The Anti-Kickback Statute (AKS) is a criminal law that prohibits the knowing and willful payment of remuneration to induce or reward patient referrals payable by Federal health care programs, including drugs, supplies, or health care services. Remuneration includes anything of value and can take many forms besides cash, such as free rent, expen-

sive hotel stays and meals, and excessive compensation for medical directorships or consultancies. Criminal penalties and administrative sanctions for violating the AKS include fines, jail terms, and exclusion from participation in the Federal health care programs. Safe harbors protect certain payment and business practices that could otherwise implicate the AKS from criminal and civil prosecution.

Q: Dr. Smith occasionally sends patients to one of our St. Luke's entities. He said he would send us more patients if we provide him with free or discounted office space. Can we do this?

A: *No. We cannot offer anything of value in exchange for patient referrals. In addition, we must charge all physicians fair market value for office space. Free or discounted lease arrangements may appear to be an incentive for referrals from the physician. The Real Estate Leasing Arrangements Policy (COMP-3) provides more details on lease arrangements.*

Policies

Review the following policies for more detailed guidance:

1. Compliance with Law (COMP-4)
2. Free or Discounted Transportation (#250)
3. Gifts and Entertainment (#157)
4. Non-Monetary Compensation Provided to Medical Staff Members and their Immediate Family Members (#251)
5. Patient Discount Policy (#263)
6. Real Estate Leasing Arrangement (COMP-3)
7. Subpoenas, Complaints, Summons (#147)
8. Corporate Compliance, Anti-Fraud and Whistleblower Protections (Employee Handbook)



False Claims Act

The False Claims Act (FCA) is a federal law that imposes liability on any person who submits a claim to the federal government that he or she knows (or should know) is false. For example, the FCA prohibits a provider from seeking to obtain money from the federal government for services that were not provided or were unnecessary through the use of false statements or records.

St. Luke's will admit and accept for treatment only those patients who medically need treatment and/or services by using standard clinical admission criteria that include medical necessity guidance. St. Luke's does not waive insurance co-payments or deductibles to obtain admissions. We do not offer courtesies or discounts to our medical staff or trustees. However, we may provide appropriate financial accommodations (e.g., allowing payment arrangements) to patients based on their financial need.

Q: While preparing claims for submission to Medicare, I believe there are charges for some services that are inappropriate based on Medicare's billing rules. Should I submit the claims anyway and let Medicare determine if the charges are appropriate?

A: *No. It is inappropriate to submit claims to Medicare, or any other payers, that are known to be inaccurate. If you believe the charges are inappropriate, you should notify your supervisor of your concerns. If you are uncomfortable discussing the concern with your supervisor, then follow the guidance outlined on page 4 to report the concern.*

Q: We were recently notified by Medicare of some billing errors. The questionable claims have been corrected. However, we haven't changed our practices that caused the billing errors to occur in the first place. Do I have a responsibility to tell someone?

A: *Yes. All of us have a responsibility to seek answers to our questions and concerns. Speak with your supervisor to make sure you fully understand the situation. If you are still concerned that appropriate actions have not been taken to resolve the billing issues, contact our Network Compliance Department. See page 4 for contact information.*

Stark Law

The Physician Self-Referral Law, commonly referred to as the Stark Law, prohibits physicians from referring patients for designated health services paid for by Medicare and Medicaid to any entity in which the physician or an immediate family member of the physician has a financial relationship, unless an exception exists. A "financial relationship" includes any direct or indirect ownership or investment interest by the referring physician, as well as any financial interests held by any of the physician's immediate family members. Unlike the Anti-Kickback Statute, a violation of this law does not have to be intentional.

Q: We want to hire a physician and pay her to provide services at St. Luke's. Can we do so?

A: *Yes. St. Luke's strives to be proactive by determining the medical staff and community needs as a response to our growth. At the same time, we want to ensure compliance with legal and regulatory laws. You should not negotiate contract terms until you have consulted with St. Luke's Legal Services Department*

Stark Law Examples

Some examples of kickbacks, referrals and bribes may include, but are not limited to:

- Accepting remuneration such as cash or cash equivalents, trips, lodging and food in return for buying supplies or services
- Establishing payment arrangements with vendors, suppliers or other referral sources where reimbursement is based on volume of business rather than value of the services provided
- Making/receiving discounts or payments in exchange for referrals
- Providing or accepting from referral sources any free (e.g., office space) or discounted goods or services



to ensure the terms are legal and adhere to St. Luke's policies.

Antitrust Compliance

Competition in the healthcare industry benefits consumers because it helps contain costs, improve quality, expand choice, and encourage innovation. Antitrust laws in healthcare are designed to protect competition and to prevent anticompetitive conduct. Our employees and business partners should not take advantage of anyone through practices that are deemed inappropriate or unfair. We also must avoid discussion with competitors that may appear to restrain competition unreasonably.

Q: My friend and I have similar roles in Human Resources Departments with competitive hospitals located in the same city. She wants to do a survey of health care salaries. May I share general employee salary information with her?

A: No. Not only is salary information confidential but sharing salary information on a large scale may appear to be an effort to fix wages and limit competition in the marketplace.

Antitrust Compliance Examples

Examples of activities that could violate antitrust laws:

- Bribery, deception, intimidation and other unfair trade practices
- Discussing or agreeing with competitors about market territories, prices, provider reimbursement rates and compensation and benefits
- Failing to exercise caution when participating in collaborative projects, benchmarking surveys and information exchanges involving competitors even when such projects appear to serve the public interest
- Participating in activities that are designed to exclude competitors
- Participating in boycotts with competitors





Responding to Government and Other Agencies

St. Luke's is subject to various laws, rules and regulations, which may include, but are not limited to, certificates of need, licenses, permits, accreditations, and Medicare and Medicaid requirements. Government and other agencies can conduct surveys and issue warrants or subpoenas, as well as appear unannounced at a St. Luke's facility to validate that we are meeting these standards. It is St. Luke's philosophy to cooperate fully with government and accrediting agencies when requested.

Our expectation is for employees to respond to such requests for information in a timely, cooperative and honest manner. During a survey or inspection, employees should a) remain calm, b) ask for identification and a business card of the surveyor, and c) immediately contact your manager, manager's supervisor or the Administrator on Call.

Employees and business partners should never alter any documents, conceal, destroy or obstruct the communication of information or make misleading statements to the agency representative. We also will not persuade any employee or other person to be uncooperative with government investigators. When we are a witness to misconduct or illegal behavior, we must immediately report violations or suspected violations to a manager or by following the reporting concerns on page 4.

Employees should immediately notify St. Luke's Legal Services or Network Compliance Departments upon presentation of a search warrant, subpoena, or other criminal or administrative legal process by a law enforcement official (e.g., FBI, State Bureau of Investigation, US Department of Justice, HHS Office of the Inspector General, etc.). These departments can provide guidance on how to respond to a particular request of information. If a government agent asks to speak with you, explain that you

are required by Network policy to notify the Legal Services or Network Compliance Department before any information is provided. The request will be evaluated, including whether a subpoena will be required for disclosure of the requested information and/or whether legal counsel will attend any requested interview with a government agent. Employees have the right to request that any government inquiry or interview be postponed until the employee has had the opportunity to consult with the Legal Services or Network Compliance Departments.

Q: I received a telephone call from someone who said he was a government investigator. He asked me about our restraint process and policies and said an agent would come to our hospital in the next few weeks. I did not give him any information. How do I respond to this type of phone call and what do I do when the agent appears at the hospital?

A: *When an agent or inspector calls by phone, the employee should document the caller's name, title, agency department, badge or ID number and telephone number. You can use this information after the conversation to call the government agency to verify the caller's identity. If an investigator comes to your department, ask for the same information listed above, then contact your manager.*

Q: A state government agent conducted an investigation in our facility for several weeks. When he finished, we included the agent in our lunch celebration. Are we allowed to do this?

A: *No. Do not provide gifts or courtesies to any government employee. Although you were simply being friendly, the lunch celebration could be seen as a bribe. You or your manager should immediately report this incident using St. Luke's reporting options available on page 4.*



Excluded/Sanctioned Individuals

St. Luke's does not employ or conduct business with individuals or organizations that have been excluded from participating in federal healthcare programs. St. Luke's conducts pre-employment, pre-contracting, pre-credentialing and ongoing exclusion checks on individuals, providers and organizations with which we have an association. Typically, exclusions from federal healthcare programs are a result of Medicare or Medicaid fraud, licensure board actions, quality of care violations or other federal healthcare program related incidents. We will terminate our business relationship or employment arrangement with an individual or organization found to be excluded from a federal healthcare program.

The federal government will not pay for services provided by an individual or organization that has been excluded from participation in federal healthcare programs. We will determine refund amounts of any revenue and costs associated with excluded persons or organizations and work with the government to resolve any payments received related to the exclusion. For more information about this subject, employees should refer to our OIG/GSA Exclusion Screening Policy (#247).

Environmental Responsibility

St. Luke's recognizes the importance of providing a comfortable and safe environment by observing environmental procedures, policies, laws and regulations. We assure environmental safety by properly disposing of medical waste, damaging substances and hazardous materials as an effort to meet the needs of our employees, patients, visitors, business partners and community.

We maintain a comprehensive Emergency Management and Safety Manual that provides guidance on following emergency and safety procedures whether it's a hospital campus or freestanding facility. The manual includes guidance on such subjects as:

- Active Shooter Response
- External Disasters
- Fire Emergency Response
- Infant Abduction
- Internal Disasters
- Personal Protective Equipment
- Reporting a Workplace Injury

Employees must immediately report environmental or safety concerns to their supervisor, the Human Resources Department or the Safety Officer, where applicable. We will take appropriate action to prevent harm to individuals, the property and the environment.

Policies

Employees should reference the emergency disaster recovery and safety plan for their specific work location. Review the following policies, which is not an all-inclusive list, for more detailed guidance:

- Culture of Safety & Non-Punitive Reporting (#38)
- Emergency Response Matrix (MyNet Quick Links)
- Employee Handbook: Safety and Security
- Environmental Services Policy and Procedure Manual (ESPPM)
- Network Physical Environment Management Plan (#1)
- Possession of Firearms and Weapons (#16)
- Waste Management (#28)

Business Ethics



St. Luke's is proud to operate its business ethically and honestly by leading with integrity in all our business activities. Our Code provides the guiding principles and standards of business conduct for all employees, trustees, vendors, business partners and others to follow and implement to achieve a commitment to integrity. It is important for individuals to use sound judgement at all levels by being fair and trustworthy in all business activities, practices and relationships.

Tax Exempt Status

As a not-for-profit organization, St. Luke's is exempt from federal and state taxes. To maintain this designation, St. Luke's must meet several criteria, including the advancement of a charitable purpose and operating entirely free from private profit motive. We must also provide significant charity care to patients who otherwise could not afford health care services and/or treatment.

Unethical Activity Examples

Activities that may jeopardize tax-exempt status include:

- Campaigning for or endorsing political candidates.
- Conducting business that results in an improper private benefit to a third party.
- Providing a service at less than fair market value, unless exceptions exist under organizational policy or federal or state law.
- Providing physicians with incentives or compensation plans that are more than fair market value.

Political Campaign and Legislative Activities

As a not-for-profit organization, St. Luke's is prohibited from directly or indirectly participating in, or intervening in, any political campaign on behalf of (or in opposition to) any candidate for elective public office. Contributions to political campaign funds or public statements of position (verbal or written) made on behalf of St. Luke's in favor of or in opposition to any candidate for public office may be prohibited and could result in denial or revocation of tax-exempt status and the imposition of certain excise taxes.

Certain activities or expenditures may not be prohibited depending on the facts and circumstances. For example, certain voter education activities (including presenting public forums and publishing voter education guides) conducted in a non-partisan manner do not constitute prohibited political campaign activity. In addition, other activities intended to encourage people to participate in the electoral process, such as voter registration and get-out-the-vote drives, would not be prohibited political campaign activity if conducted in a non-partisan manner.

Business Partner Relationships

We require our business partners to observe the same level of integrity, responsible business conduct and compliance with laws as St. Luke's and our employees. Business partners, include, but are not limited to, non-employed medical staff members, non-employed allied health professionals, volunteers, contracted individuals, vendors, medical residents and students. We also expect our business partners to safeguard patient and other confidential information through a written agreement, such as a business associate agreement or data use agreement.



Regarding our relationships with vendors and contractors:

- We select our vendors and contractors in a fair and reasonable manner. We look at their quality, technical excellence, price and ability to meet delivery schedules. We do not make decisions based on personal relationships or favoritism.
- They should remain free from improper conflicts and adhere to all applicable laws, as well as overall good business practices.
- We do not ask for or accept inducements to steer business to specific vendors or contractors.
- We do not accept kickbacks.
- We do not knowingly do business with any vendor or contractor who has been excluded from participating with federal healthcare programs.

You may use our reporting options shown on page 4 to: (1) ask questions if you are concerned about a business partner relationship or (2) to report inappropriate activity by our business partners. For more information about this subject, employees should refer to our Vendor Credentialing and Conduct Policy (#239).

Q: My sister-in-law is a healthcare consultant. Would it be a conflict if I recommend her to work on a project at my hospital?

A: *No, unless you do something to provide her with an advantage or special consideration. Your family member may apply to work as a consultant; however, you may not use your position to influence the decision to hire your relative. Do not share information with your relative that is not available to other potential vendors.*

Competitors and Confidential Information

Employees should be aware that competitors may be both a valued partner for some purposes and a competitor for others. Therefore, it is very important to maintain the privacy of business information when interacting with a competitor and its employees. Employees or others acting on behalf of, or at the direction of, St. Luke's should be mindful about a) discussions with competitors in connection with legitimate business activities such as joint ventures, b) job-related discussions with personal friends who are employees of competitors and c) discussion with competitors at conferences or other industry events. By remaining vigilant and protecting St. Luke's confidential information, you will help us maintain our continued growth and success.

Confidential Information Examples

Examples of confidential information that are prohibited to be shared with competitors without authorization or permission include, but are not limited to:

- Acquisition and merger information
- Business procedures
- Contract terms
- Employee data
- Financial data
- Launching a new service or product
- Marketing strategies and techniques
- Pricing and cost data
- Salary data
- Strategic plans



Marketing Practices

St. Luke's utilizes marketing strategies as an integral component of its business operations and activities. We understand that marketing practices that are truly effective must be moral and legal. This is one of the reasons why we provide reliable and responsible sources of information about health care to the community. Our marketing, communications, and advertising activities inform the community about health issues, increase awareness of our services and encourage healthy life-style choices.

Marketing Examples

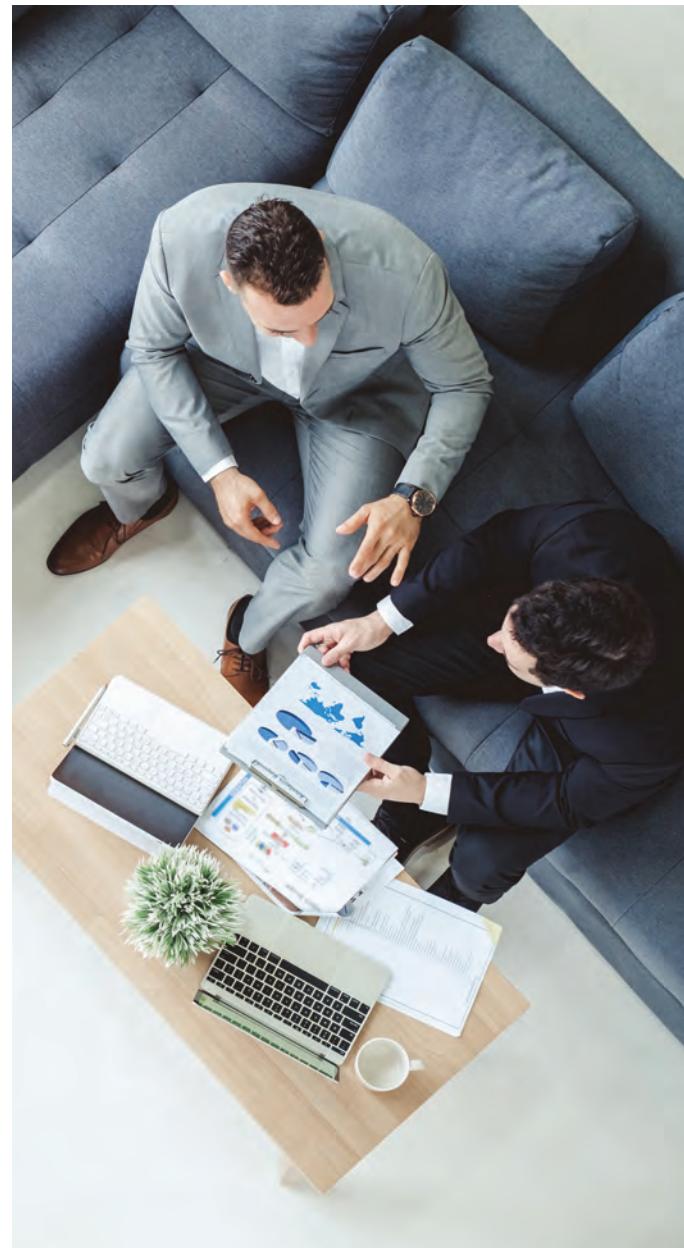
In addition, for all marketing, communications, fundraising and advertising activities, we will do the following:

- Comply with federal and state laws.
- Present truthful information to the public.
- Distinguish opinion from fact when presenting issues.
- Avoid the use of unauthorized copying or use of copyrighted works of others, including but not limited to, unauthorized downloading or distribution of articles, computer software, graphics, music, movies and pictures.

Employees are encouraged to report inappropriate marketing tactics or activities using the reporting options on page 4. For more information, employees can review the Release of Information: Marketing Policy (#197) and Fundraising Policy (#81).

Q: Two oncology physicians, who are not employees of St. Luke's, just joined the medical staff to provide a new service. Can St. Luke's send an announcement to the community to highlight this new service?

A: *Yes, this is generally acceptable if the announcement is informational and does not promote incentives for the patient to be treated at the oncologists' private practice. However, you should consult St. Luke's Chief Compliance and Privacy Officer or Legal Services to ensure the announcement is appropriate.*





Gifts

The process for accepting and offering gifts to and from patients, physicians, employees, vendors and other business partners can be challenging. We acknowledge that certain gifts and entertainment, on a modest scale, are legitimate for the purposes of building good business relationships. However, we want our employees to be mindful that gifts and entertainment can create a perception of conflict of interest that can damage the integrity of our business relationships and cause financial and reputational harm to St. Luke's.

Our employees, their family members and other individuals or entities acting on behalf, of or at the direction of, St. Luke's are prohibited from soliciting, accepting or offering anything of value that is intended to improperly influence or induce misconduct or improper behavior. Individuals are prohibited from directly or indirectly giving anything of value to St. Luke's employees, physicians, patients or our business partners to obtain or retain business or gain favorable treatment. For more information about this subject, employees should refer to our Gifts and Entertainment Policy (#157).

Gift Examples

Gifts and entertainment are described as anything with a value of \$100 or greater including, but not limited to:

- Conference registration fees
- Lodging
- Discounts
- Meals and beverages
- Event tickets
- Prizes
- Favors
- Services
- Goods (e.g., equipment, transportation flowers, clothing)
- Travel expenses

GIFTS AND ENTERTAINMENT MUST NEVER:

- Include cash or cash equivalents (e.g., gift cards, stocks, gift certificates)
- Create a potential conflict of interest
- Give the perception of an undue influence
- Unjustifiably influence business or political decision-making

Consequences for Non-Compliance

At St. Luke's, we act in accordance with applicable laws and regulations. Additionally, we have a responsibility to act in a manner consistent with our mission, vision, values, and policies. Failure to comply with laws, regulations and organizational standards can lead to serious consequences. Individuals can be personally liable and charged with criminal, administrative and financial penalties. Also, non-compliance may compromise patient safety and quality of care.

Employees, vendors and other business partners are expected to understand and comply with the Code as

well as our other policies and procedures as a condition of continued employment or business relationship with St. Luke's. Additionally, employees should understand the Employee Sanctions Guidelines Policy (#254), as they may be subject to corrective action, including suspension or termination of employment or contractual relationship, for non-compliant behavior. Violations by a vendor, business partner or their employees must be reported immediately and may lead to termination of our business agreement with that vendor or business partner.

Resources



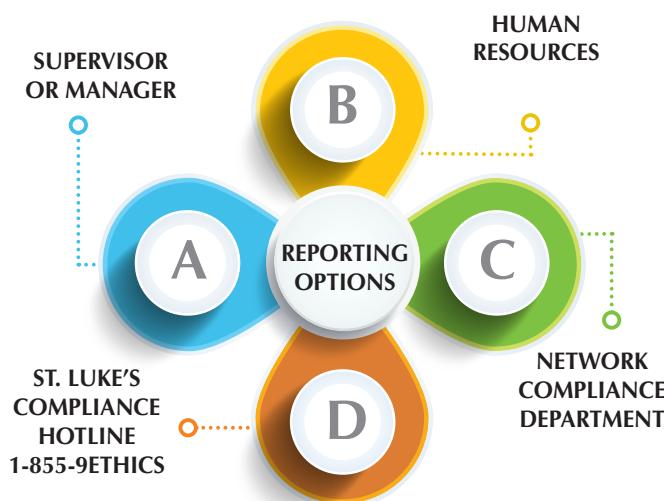
Seeking Guidance

The Network Compliance Department serves as a valuable resource for employees. The Reporting of Potential Compliance Issues Policy (COMP - 2) should be referenced as a guide to determine what concerns to report. We want you to always feel comfortable reporting concerns, asking questions, seeking guidance and requesting additional training, when necessary.

Reporting Concerns

Individuals should promptly report concerns or misconduct as soon as it happens. All reported concerns are taken seriously and investigated appropriately. If you are concerned about the potential for retaliation due to reporting, please remember we have a Non-Retaliation Policy (#253), which you can review for more details.

You may contact any of the following resources to ask your question or report a concern:



Education and Training

General compliance education and training is offered at St. Luke's to help you understand and comply with our expectation of ethical and responsible conduct. This education and training is provided within a reasonable time from your new hire date and annually thereafter. Employees may also receive specialized training on certain topics, rules and regulations that relate specifically to their jobs. In addition, all policies are available online and employees should review the policies regularly and as needed.

Contact Information

Employees can contact specific departments with questions:

Accreditation & Standards 484-526-2674

Central Business Office 484-526-3150

Central Verification Office 484-526-4660

Clinical Trials 484-526-0629

Clinical Documentation 484-526-8977

Coding Operations:

Department Issues 484-526-3642

IP Coding 484-526-1254

OP Coding 484-526-2998

DRG Denials 484-526-3758

Communications and Marketing 484-526-4130

Health Information Management
(formerly Medical Records) 484-526-4760

Hotlines:

Compliance 1-855-9ETHICS (1-855-938-4427)

Patient Safety 484-526-4044

Human Resources:

Employee Resource Center (ERC) ... 267-831-3209

For specific recruiting/employee relations questions,
contact your campus HR team directly

Institutional Review Board (IRB) 610-775-4832

Quality 484-526-4121

Risk Management &
Patient Safety 484-526-6167