

Deaconess Health Plans

Code of Conduct

Vision Mission & Values

Deaconess Mission

- ▶ In keeping with our Christian heritage, Deaconess' mission is to advance the health and well-being of our community with a compassionate and caring spirit.

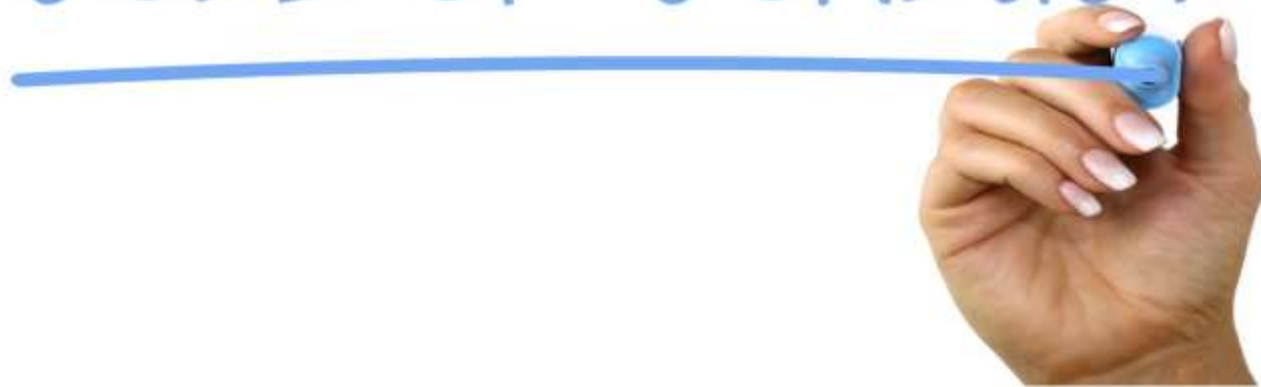
Deaconess Vision

- ▶ To be the preferred regional health care partner for patients, providers, employees and payers, with access to innovative, efficient, top quality health care.

STANDARDS OF EMPLOYEE CONDUCT AND PERFORMANCE

Deaconess strives to maintain safe, orderly, efficient and effective operations, while at the same time preserving an enjoyable work environment. This objective can be achieved by establishing specific standards of conduct and performance and to make these standards known to our employees. Although it is not possible to list all forms of conduct that are considered unacceptable in the workplace and that will result in disciplinary action, up to and including termination, the following are some examples of conduct that each employee is expected to follow:

CODE OF CONDUCT



STANDARDS OF EMPLOYEE CONDUCT AND PERFORMANCE

Respect for Others

- ▶ Employees are expected to show respect toward others, to treat others with dignity, and to be courteous and helpful at all times. Employees are expected to use good judgment and conduct themselves in a professional manner while at work, on business, at work-related social functions and during business travel.

Discrimination and/or Harassment

- ▶ All employees are expected to comply with applicable laws, regulations and policies regarding equal employment opportunity and fair employment practices. Discrimination and/or harassment of employees, staff, visitors, patients, or vendors will be grounds for disciplinary action up to and including termination.

Satisfactory Performance

- ▶ Employees are expected to meet or exceed standards of performance as communicated to them verbally and/or in writing. Employees must practice within the scope of their license and/or job description.

STANDARDS OF EMPLOYEE CONDUCT AND PERFORMANCE

Licensure, Certifications and Registrations Required to Practice

- ▶ Employees working in positions requiring licensure, certifications or registrations should have applicable licenses in good standing.

Exclusion Lists

- ▶ Employees whose behavior results in actions taken by state, federal, or professional organizations to place them on the Exclusion List of the Office of Inspector General for Health and Human Services, will be subject to termination of employment. Human Resources conducts ongoing reviews of the employee data base against the OIG List of Excluded Individuals/Entities (LEIE) and the GSA Excluded Parties List (EPLS).

Care Of Property

- ▶ Employees are to take care of the property with which they are entrusted and to respect the property of others. Work areas should be kept safe, clean, neat, orderly and free of litter. Problems with equipment and materials must be promptly reported to management.

STANDARDS OF EMPLOYEE CONDUCT AND PERFORMANCE

Confidentiality

- ▶ Employees must safeguard the confidentiality of Deaconess records and other confidential information such as patient information, Protected Health Information (PHI), Information System passwords, employee information and lists, blue prints, strategic or other plans, and any other confidential information. It is the employee's responsibility to ask management whether Deaconess considers certain information confidential. Such information may never be disclosed to non-employees without prior authorization of management.

Conflict Of Interest

- ▶ Employees must exercise the utmost good faith in all transactions affecting Deaconess and not use their positions or knowledge gained there from to create a conflict between the interests of Deaconess and themselves. Any situation that creates, or even appears to create a conflict of interest between personal interest and the interests of Deaconess must be avoided. Potential conflicts of interest should be reported to management in order to determine how best to handle the situation.

Fitness for Duty

- ▶ Employees are to report to work physically fit for duty and mentally alert.

Gambling

- ▶ Employees may not gamble during work time or on Deaconess premises.

Off-Duty Conduct and Criminal Activities

- ▶ Employees are responsible for maintaining off-duty conduct that will not adversely affect the employer-employee relationship or bring disrepute on themselves or Deaconess.



STANDARDS OF EMPLOYEE CONDUCT AND PERFORMANCE

Orderly, Safe Behavior

- ▶ Employees must be aware of and comply with all safety rules and regulations, including the prompt reporting of safety hazards and accidents. Employees are to refrain from fighting, bullying, indecent behavior, abusive language, threatening others, or otherwise creating an unsafe, intimidating environment. The possession of explosives or hazardous materials during work time or on Deaconess premises is prohibited. The possession of firearms or ammunition on your person during work time is prohibited. The unauthorized use, sale, or possession of drugs or alcohol on Deaconess premises or while conducting Deaconess business off premises is also prohibited. Professional conduct is expected at all times.

Investigations

- ▶ From time-to-time, Deaconess may find it necessary to conduct an investigation. Employees are expected, as a condition of employment, to cooperate with all investigations. Cooperation includes, but is not limited to, submitting to a search of the employee's person and/or personal property. Failure to do so will constitute insubordination.

Political Activity

- ▶ Employees engaging in political activities must not let such activities interfere with their job responsibilities.

STANDARDS OF EMPLOYEE CONDUCT AND PERFORMANCE

Honesty and Ethical Behavior

- ▶ Acts of dishonesty, including but not limited to providing false information to Deaconess in any form or failing to disclose completely all information requested by Deaconess, will not be tolerated. Honesty in dealing with one another, with patients and with others encountered in the course of business is required. Employees have the responsibility to promote, create and maintain a positive work environment in which ethical conduct and a strong sense of morality are not only expected but fostered. Employees should never defraud anyone of money, property or services.

Compliance with Government Rules and Fair Dealing

- ▶ Deaconess is committed to complying with government rules, including but not limited to Medicare Conditions of Participation, patient rights, health care fraud and abuse, facility and personnel licensure, labor and employment laws, and to fair dealing with all health care payers. Employees are expected to be familiar with government rules relating to their job and to adhere to these requirements. Employees are both encouraged and expected to ask questions if they do not understand rules relating to their job. Management employees are expected to maintain current knowledge of the rules relative to their responsibilities and provide training and education to affected staff. Employees are expected to be honest and ethical when dealing with one another, with staff, patients, visitors and any other individual encountered in the course of business. Employees are expected to be familiar with the Deaconess Corporate Compliance Program and report potential violations, problems, concerns, or questions. Such reports may be made on a confidential basis and without fear of reprisal. Employees who fail to meet Deaconess expectations with respect to any aspect of the Corporate Compliance Program will be subject to discipline, up to and including immediate termination. Persons in leadership positions who encourage staff to not report ethical or compliance concerns are themselves in violation of this standard.

Inappropriate Use of Deaconess Computers and Communication Systems

- ▶ Deaconess computers (including Internet access/use and email), computer systems, computer applications and communication devices (e.g., telephones, pagers, cell phones, fax machines and personal communication devices) are available to many employees to assist them in performing their job responsibilities. Employees are expected to refer to specific policies for appropriate usage requirements and expectations. However, it should be noted that some types of use of activity would never be permissible, for example, sending/receiving/viewing pornographic images, making threats, etc.

Deaconess Values

At Deaconess, our values are based on our commitment to quality. We define quality as the continuous improvement of services to meet the needs and exceed the expectations of the customers we serve.

- ▶ Quality in everything we do
- ▶ Respect for all people
- ▶ Efficiency and effectiveness in the use of resources
- ▶ Innovation toward continuous systems improvement
- ▶ Partnership with those we serve and with suppliers
- ▶ Education for continuous growth and knowledge
- ▶ Pride in workmanship

COMPLIANCE AND ETHICS PROGRAM

Corporate Compliance and Ethics Program encompasses all functions and entities of Deaconess Health System. In addition, the Program encompasses all applicable federal, state and local laws and regulations such as Medicare and Medicaid regulations, insurance laws, tax laws, employment laws, safety and environmental laws. The Program has been structured with consideration of the Federal Sentencing Guidelines and guidance's published by the Office of Inspector General (OIG) for Hospitals, Clinical Laboratories, Third Party (Medical) Billing, Home Health Agencies, Durable Medical Equipment, Prosthetics, Orthotics, and Supply Industry, Hospices, Nursing Facilities, and Individual and Small Group Physician Practices.

The purpose of the Deaconess Corporate Compliance and Ethics Program is to maintain a system-wide program for promoting an organizational culture that encourages ethical conduct and preventing, detecting, and correcting possible violations of federal, state and local laws and regulations and Deaconess Codes of Conduct and Policies and Procedures.

Deaconess Health System (DHS) is committed to promoting a culture that encourages ethical conduct and complying with federal, state and local laws. Full compliance with all laws is the expected behavior of Deaconess Health System staff. The System will not tolerate fraud or abuse or other improper activities in any of its operations.



COMPLIANCE AND ETHICS PROGRAM

The objectives of the program include:

- ▶ Establishing standards of performance through Codes of Conduct and Policies and Procedures.
- ▶ Designating a Corporate Compliance Officer (CCO), with a direct reporting responsibility to senior management and the Board of Directors, who is responsible for leading and managing the Program to promulgate compliance with standards for ethical conduct and government laws and regulations.
- ▶ Providing required training and education to ensure staff are aware of the relevant legal standards and regulations.
- ▶ Maintaining a reporting system, to include a confidential hotline, to receive complaints, adopting procedures to protect the anonymity of the callers, and ensuring staff understand their individual responsibility for reporting any activity by any staff member, physician, contractor, subcontractor, vendor or volunteer that appears to violate applicable laws, rules, regulations, accreditation standards, standards of medical practice, federal healthcare conditions of participation, or the Deaconess Code of Conduct and Policies and Procedures.
- ▶ Investigating all reported concerns promptly and confidentially to the extent possible and consulting with the Corporate Compliance Officer to ensure that disciplinary action taken is substantiated and is proportionate to the violation.
- ▶ Using audits and other analytical tools to assess risks, monitor compliance and reduce problem areas.
- ▶ Initiating corrective action, including, as appropriate, making prompt restitution of any overpayment amounts, making certain disciplinary action taken is substantiated and is proportionate to the violation and implementing systemic changes to prevent a similar violation from recurring in the future.

COMPLIANCE AND ETHICS PROGRAM

The following procedures apply to all Deaconess Health System entities:

- ▶ Management is responsible for Demonstrating and promoting ethical and compliant behavior with employees, officers, directors, contractors, vendors, agents and volunteers; Participating in and ensuring staff obtains required education and training in relevant policies and procedures, legal standards and regulations; Establishing, documenting, and communicating to staff the applicable laws and regulations that affect their duties and activities; assessing departmental activities, policies and procedures to identify risk areas where violations may occur. And reporting possible or known violations to the Corporate Compliance Officer within 24 business hours.
- ▶ All Employees have a duty to seek guidance and report to his or her Supervisor, to the Corporate Compliance Officer, or to the confidential reporting system possible violations.
- ▶ The Medical Staff members are responsible for contacting either the Vice President of Medical Affairs, the Corporate Compliance Officer or utilizing the confidential reporting system to report possible violations.
- ▶ Entities must demonstrate that they have identified risk areas where violations may occur. This includes the use of auditing and monitoring, ongoing risk assessment, and periodic evaluation of the effectiveness of their respective Compliance Programs.
- ▶ Education and Training of all staff will be required in relevant legal standards and requirements.



COMPLIANCE AND ETHICS PROGRAM

- ▶ Documentation of all compliance activities is required, including, but not limited to, minutes of meetings, policy and procedure development and/or revision, auditing and monitoring activities, risk assessments, complaints received, staff training and education.
- ▶ To prevent hiring or contracting with any excluded individual, Deaconess entities screen all prospective owners, officers, directors, employees, contractors, agents and volunteers prior to engaging their services and screen all physicians prior to granting staff privileges by: a) Requiring applicants to disclose whether they are an excluded individual, and b) Querying the General Services Administration's List of Parties Excluded from Federal Programs and the OIG List of Excluded Individuals / Entities. For non staff physicians, Deaconess entities screen these providers against the OIG List of Excluded Individuals prior to billing for services.
- ▶ Suspected violations of laws, regulations, policies and procedures should be reported directly to an employee's supervisor, the entity-specific compliance officer and/or the Corporate Compliance Officer or by calling the published dedicated compliance anonymous telephone number. Every effort will be made, within the limits of the law, to protect the identity of the caller. Management personnel or peers who attempt to retaliate against another individual who reported a possible or known violation in good faith will be subject to discipline up to, and including, termination. Any individual who deliberately makes a false accusation with the purpose of harming or retaliating against another individual will be subject to disciplinary action up to, and including, termination.
- ▶ The entity-specific Compliance Officer and/or the Corporate Compliance Officer coordinate investigations of reported violations. Investigative plans will include: defining scope of issues; identifying employees or others to be interviewed; gathering, reviewing and analyzing documents; conducting audits; retaining necessary legal counsel; and retaining necessary consultants. Periodic updates and a final report will be provided to senior management and the Board.

COMPLIANCE AND ETHICS PROGRAM

- ▶ The Corporate Compliance Officer and Corporate Compliance Committee review results of investigations and develop appropriate plans of correction. Corrective action will include: disclosing to appropriate agency; making appropriate prompt restitution of any overpayments; taking disciplinary action that is substantiated and is proportionate to the violation; providing training; monitoring and auditing; and implementing systemic changes to prevent a recurrence of a similar violation.
- ▶ The Corporate Compliance Officer and the Manager of Internal Audit are responsible for developing and using internal controls for auditing and monitoring activities in all areas.
- ▶ The Corporate Compliance Officer, the Corporate Compliance Committee and the Board of Directors for Deaconess Health System through the Audit and Compliance Committee, are responsible for reviewing and updating the Deaconess Ethics and Compliance Program to ensure that Deaconess Health System has an effective ethics and compliance program. This will require periodic independent reviews.

Our Goals

To accomplish its mission, Deaconess is committed to improving the quality of life for the people of the Tri-State by:

- ▶ Demonstrating excellence in health care services
- ▶ Providing access to health care
- ▶ Providing charity care to those in need
- ▶ Promoting healthy lifestyles
- ▶ Offering spiritual and psychological support
- ▶ Supporting health related education
- ▶ Advancing health knowledge through research

Code of Business and Professional Ethics

Deaconess Health Plans Code of Business and Professional Ethics provides guidelines directing the activities and behavior of our organization, its boards of directors and managers, medical staff and employed staff. This Code assists us in identifying our values and choosing among alternative courses of action in decision- and policy-making. It is a work in progress. Therefore, all who are associated in any way with Deaconess are invited to examine and reflect upon this Code and to participate in the process of continuing review and revision.



Code of Business and Professional Ethics

- ▶ We will provide treatment within our capabilities and mission for all persons in need of medical care with dignity and respect without regard to race, creed, color, age, gender, gender identity, ethnic or national origin, disability, lifestyle, or ability to pay.
- ▶ We will comply with all State and Federal regulations to ensure that accounts are properly billed.
- ▶ We will provide charity care when adequate information is given to justify nonability to pay.
- ▶ We will provide all patients with a written statement of their rights and responsibilities as patients including their right of patients to be informed of the nature of their illness and treatment options, including potential benefits, risks, alternatives and costs; to know the identity and professional status of those responsible for their care; and to participate with family/surrogates and caregivers in their care discussions. We will honor advance directives or assist patients in preparing one. When a patient has no directive and lacks decision-making ability, a surrogate decision-maker will be sought.
- ▶ We will respect and honor patients' needs for personal privacy, safety, confidentiality of medical information, clear and understandable communication, emotional and spiritual support, and care that promotes comfort and optimal management of pain.
- ▶ We will provide a prompt and courteous response to any complaints concerning the quality of care or service and patient safety.
- ▶ We will encourage patients to raise any ethical issues concerning their treatment with their physician or other caregiver and/or the facility's ethics committee, and to participate in the resolution of those issues.

Code of Business and Professional Ethics

- ▶ We will admit, discharge or transfer patients only as their medical condition warrants, as determined by their physician, apart from any financial considerations or incentives of the provider that may be involved.
- ▶ We will expect physicians (practitioner) practicing at any of the Deaconess entities to avoid compromising the quality of care and base their clinical decisions on identified patient health care needs.
- ▶ We will honor the right of the patient or appropriate representative to share in and approve decisions related to his/her care. Differences of opinion may arise among those who participate in patient care decisions. In such cases, the clinical case managers or designee will assist the physicians (practitioner) in facilitating communication between the physician, patient, family, and other members of the health care team in this decision-making process to ensure that the clinical decisions agreed upon by the physician (practitioner) and patient and/or family will be implemented.

Code of Business and Professional Ethics

- ▶ We will provide guidance applicable to staff, patients, family or others who may request information regarding the protection of clinical decisions of the physician (practitioner) at Deaconess Entities.
- ▶ We will comply with all federal statutes in relation to the Emergency Medical Transfer and Active Labor Act (EMTALA), 42 USCA s 1395dd, and regulations promulgated there under 42 CFR s 489.24.
- ▶ We will assist the patient in finding alternative care to Deaconess if a decision is made not to admit a patient to Deaconess based on lack of capability, or capacity.
- ▶ We will accept requests for transfer of patients, from another institution to Deaconess, which are medically appropriate and within the capabilities and capacities of the Deaconess entity.
- ▶ As a transferring hospital, we will provide medical treatment within our capacity that minimizes the risks to the individual's health and, in the case of a woman in labor, the health of the unborn child.
- ▶ We will support the rights of physicians to request consultations from other physicians or to discuss cases with other physicians on a physician-to-physician basis.



Code of Business and Professional Ethics

- ▶ We will facilitate the movement of patients within the facility at the time of discharge in accordance with the desires of the patient/family and physician orders while maintaining the quality of patient care.
- ▶ We will maintain and make available to the patient and family a list of available post-hospital discharge planning agencies operating in the Tri-State area.
- ▶ We will provide discharge planning to achieve written projected time frames and goals that lead to the timely release of patients to either their homes or facilities/programs with a lower level of care.
- ▶ We will maintain a working relationship with Kepro the Quality Improvement Organization (QIO) for Indiana.
- ▶ We will bill only for medically necessary services that were ordered by a physician or other appropriately licensed provider. Should any question arise regarding the “medical necessity” of a service, adequate documentation to prove the medical necessity of the service must be provided and reviewed prior to submitting any claim for reimbursement.
- ▶ We will use accurate billing codes and prepare all bills to comply with the billing requirements of Medicare, Medicaid, and other payers. Claims will be submitted in a payer-approved format with the correct billing code assigned to the item or service provided. Care will be taken to ensure that inpatient claims are submitted according to the correct Diagnosis Related Group (DRG).

Code of Business and Professional Ethics



- ▶ We will maintain books, records and accounts that conform to generally accepted accounting principles and that fairly and accurately reflect all transactions.
- ▶ We will record all items of income and expense, and all assets, allowances and liabilities will be accurately and adequately described.
- ▶ We will routinely conduct internal audits and cooperate with external auditors.
- ▶ We will ensure that all reports submitted to governmental or other appropriate agencies are properly made, and are in accordance with the requirements of the agency.

Code of Business and Professional Ethics

- ▶ We will measure the content of health care advertising by its truthfulness, fairness, accuracy, completeness, and sensitivity to the health care needs of the public. False or misleading statements that might lead the uninformed to draw false conclusions about the health care facility, its competitors or other health care providers are unacceptable and unethical.
- ▶ We will communicate success rates, outcomes and other statistical evidences of quality with great care and in the spirit of honesty, accuracy, and full disclosure, without guarantee. We will review all marketing tools and advertisements to ensure that the information is correct and accurate prior to approval for publication and use.
- ▶ We will fully comply with the laws governing use and disclosure of Protected Health Information for Marketing , in all marketing practices with Federal Trade Commission laws and with state and local advertising regulations and the laws governing copyrights.

Code of Business and Professional Ethics

- ▶ We will comply with all federal, state and local health and safety laws and regulations affecting workplace health and safety.
- ▶ We will hire, recruit, train, promote, assign, transfer and discipline staff without regard to race, creed, color, age, religion, gender, gender identity, ethnic or national origin, disability, lifestyles, or other classifications protected by law.
- ▶ We will expect employees to demonstrate a high degree of competence; adhere to high standards of conduct and ethics; work well and cooperatively with medical, nursing and other staff and employees; avail themselves of opportunities for personal and professional growth; and comply with our Standards of Performance and Conduct.
- ▶ We will expect personnel to maintain the confidentiality of patient and business-related information as required by policy and regulatory requirements.
- ▶ We will expect employees to refrain from any type of conduct that can be construed as abuse or harassment.
- ▶ We will expect employees to avoid any situation which involves, or may involve, a conflict between their personal interests and the interests of the institution or its patients.
- ▶ We will inform employees of any violation of established rules, policies or procedures, and will counsel them and/or take appropriate action in a respectful and constructive manner.
- ▶ We will comply with all applicable federal, state and local labor and employment laws.

Code of Business and Ethics

- ▶ We will expect employees to report any actual or perceived violations of legal, ethical or behavioral rules or regulations to their supervisor, the facility Compliance Officer, the Human Resources Department, or the Deaconess Health System Corporate Compliance Officer.
- ▶ We expect all persons associated with Deaconess to deal honestly and responsibly with individuals and groups in the community.
- ▶ We encourage staff and personnel to have a sense of social responsibility and to contribute as citizens of the community to the extent possible.
- ▶ We will strive to identify, and be responsive to, the health care needs of individuals, families, and communities of our area.
- ▶ We will conduct our relations with physicians and other partners in ways that promote cooperation and enhance patient care.
- ▶ We will select and cultivate relationships with other health care providers, educational institutions, payers, and businesses whose practices and ethics are consistent with ours.



Code of Business and Professional Ethics

- ▶ We expect personnel, staff, board members, and other associates not to accept gifts, services, or items of value from suppliers or others when it might be inferred that such action is intended to influence, or may influence, his or her decision-making or responsibility to Deaconess.
- ▶ We will expect all persons associated with Deaconess to disclose any actual or potential conflicts of interest, in accordance with established policies and procedures. When uncertain as to whether a conflict of interest exists, one is expected to consult with his or her supervisor, the facility Compliance Officer and/or the Deaconess Health System Corporate Compliance Officer.
- ▶ We will strive at all times to comply with the law, and expect all associated with Deaconess to comply with federal, state, and local laws and regulations applicable to their respective activities and responsibilities.
- ▶ We expect all persons who are uncertain as to the legal, ethical, or procedural acceptability of an activity to consult with the facility Compliance Officer and/or the Deaconess Health System Corporate Compliance Officer.
- ▶ We will protect the interests of Deaconess Health System when contemplating entering into a transaction or arrangement that might benefit private interests.
- ▶ We will require board members, principal officers, employees, and members of committees with board-delegated powers serving Deaconess and any of its related institutions to divulge any actions that might reflect a conflict of interest and/or discredit Deaconess Health System.
- ▶ We will inform individuals, if it is suspected that an actual or possible conflict of interest has not been disclosed, and afford them the opportunity to explain the alleged failure to disclose.
- ▶ We will take appropriate disciplinary and corrective action if it is determined that an undisclosed conflict of interest exists and the involved individual does not eliminate the conflict of interest.



The Deaconess CREDO

We are ambassadors of Deaconess, cultivating a nurturing atmosphere of:

Courtesy

Respect

Empathy

Dignity

Optimism

References / Questions:

- ▶ The information contained in this handout is not inclusive of all of Deaconess Health System Standards of Employee Conduct, Code of Business and Professional Ethics and Compliance and Ethics Program Policies.
- ▶ If you have any questions, relating to the information in this document, please contact Corporate Compliance at 812-450-2361.

