OUR VALUES AND ETHICS AT WORK

Reference Guide
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Catholic Health Initiatives is people — people caring for people. There are thousands of individuals across the country working in our organizations and living our mission with the highest standards and integrity, nurturing the healing ministry of the Church.

Our Values and Ethics at Work
Our commitment to corporate responsibility is tied to the distinctive culture of Catholic Health Initiatives. Each of us helps shape that culture by acting in accordance with our core values and standards of conduct. We all have a personal responsibility to behave ethically and appropriately.

Health care is a complex industry. Many of the laws and regulations that govern health care are difficult to understand and to apply consistently. Catholic Health Initiatives has created this booklet to help you understand these laws and regulations. This reference guide describes our standards of conduct and how to apply them to your daily work situations. The examples in this reference guide will help you to understand the importance of having honesty, directness and respect in all of your interactions with patients/residents and their family.
members, as well as co-workers and business partners. We have included questions posed by employees, medical staff and business partners, and we have provided answers to the questions to help you understand our standards of conduct.

*Our Values and Ethics at Work Reference Guide* is designed to help you make decisions at work, however simple or difficult they may be. Of course, it is not possible to cover every situation in this reference guide. If you are struggling to determine the right thing to do in a particular situation, this booklet has information to help you.

Support for ethical decision-making is available to you at all times. Please call on that support to be confident in your decisions as you help shape and strengthen our health care ministry.

Sincerely,

Kevin E. Lofton, FACHE
President and Chief Executive Officer

A. Michelle Cooper
National Corporate Responsibility Officer

Why does Catholic Health Initiatives take corporate responsibility so seriously? Because it is an expression of our core values of Reverence, Integrity, Compassion and Excellence.”

Kevin Lofton, President and Chief Executive Officer
Catholic Health Initiatives

“At Catholic Health Initiatives, we believe that corporate responsibility begins with personal responsibility and integrity on the part of everyone who works for and with our organizations.”

Michelle Cooper, National Corporate Responsibility Officer
Catholic Health Initiatives
Where We Want to Be
Vision: Catholic Health Initiatives’ vision is to live out its mission by transforming health care delivery and by creating new ministries for the promotion of healthy communities.

Why We Exist
Mission: The mission of Catholic Health Initiatives is to nurture the healing ministry of the Church by bringing it new life, energy and viability in the 21st century. Fidelity to the Gospel urges us to emphasize human dignity and social justice as we move toward the creation of healthier communities.

How We Will Measure Our Progress
Balanced Scorecards, Dashboards, Cultural Attributes, Surveys and Evaluations
What Are Our Guiding Principles?

Catholic Health Initiatives’ core values are guiding principles that provide focus, direction and accountability. The core values play a vital role in creating identity, spirit and connection with one another in Catholic Health Initiatives.

Reverence
Respecting diverse viewpoints and working together to bring out the best in everyone.

Integrity
Being open and honest in all of our interactions.

Compassion
Caring for the whole person and the greater good of others.

Excellence
Doing our best work, providing quality care and service, and achieving our goals.

How We Live Our Values
Standards of Conduct

How We Will Get There
Our Values and Ethics at Work Reference Guide, Employee Covenant, Employee Competencies, Leadership Development, Core Values Assessments, Distinctive Culture, Strategic and Operational Plans
Catholic Health Initiatives is committed to continuing the healing ministry of the Church by creating healthy communities and defending the human dignity of each community member, especially the poor and underserved. Our Catholic identity calls us to recognize God's presence in every man, woman and child. We serve God by caring for those in need and for each other. Our core values of Reverence, Integrity, Compassion and Excellence provide focus, direction and accountability.

The corporate responsibility program of Catholic Health Initiatives and those of its organizations provide resources for making decisions based on our Catholic identity. These programs help us understand and comply with complex laws and regulations. They are founded on our core values and standards of conduct.

This reference guide provides a framework for ethical behavior based on the attributes that define our distinctive Catholic culture. Our cultural attributes call us to:

Introduction to the Corporate Responsibility Program
...an organization shall promote an organizational culture that encourages ethical conduct and a commitment to compliance with the law.”


- Create a culture that supports open and honest communication.
- Exhibit high ethical standards of conduct that promote doing the right thing.
- Cultivate our human, financial and material resources as gifts entrusted to us.
- Be accountable for our actions and performance.
- Commit to the common good.
- Share wisdom and knowledge and develop individual and organizational potentials.
- Find ways to improve work processes, service and care delivery.
- Create a healing environment and a collaborative spirit.

To support you in making the right decisions and getting answers to your questions or concerns, Catholic Health Initiatives has developed a simple reporting process, which is detailed on page 44. You are encouraged to use this process as needed to make the right decisions and to support others in doing the same.
How to Use

Our Values and Ethics at Work Reference Guide

Our Values and Ethics at Work Reference Guide is designed to help you do what is right and to ensure that your behavior demonstrates our values. At a minimum, this means obeying the law and avoiding improper activities.

This reference guide includes examples of how the standards of Catholic Health Initiatives apply to your daily work. These applications are arranged alphabetically by topic for ease of reference. Our Values and Ethics at Work Reference Guide is one of many tools that can help you work in a responsible, professional and ethical way. Other tools and resources include:

- Local and national policies and procedures, including those specific to corporate responsibility.
- Compliance reference and guidance documents.
- Educational offerings, including training in complicated or high-risk areas.
- Consultation from local and national corporate responsibility officers.
- Federal and state laws and regulations.

Our Values and Ethics at Work Reference Guide is a resource for all of us as we strive to achieve our mission. By understanding and using this reference guide, we demonstrate our commitment to our core values.
“The time is always right to do what is right.”

Rev. Dr. Martin Luther King Jr.
Our Values and Ethics at Work Reference Guide describes our standards of conduct as practical applications of our core values and cultural attributes. All board and committee members, officers, employees, volunteers, medical staff and others working with Catholic Health Initiatives and its organizations must act in accordance with the following standards of conduct:

1. Exercise good faith and honesty in all dealings and transactions.
2. Create a workplace that fosters community and honors and cares for the dignity, safety and well being of all persons in mind, body and spirit.
3. Maintain a high level of knowledge and skill among all who serve in order to provide high quality care and safety.
4. Observe all laws, regulations and policies that govern what we do.
5. Maintain the integrity and protect the confidentiality of patient, resident, employee and organizational information.
6. Avoid conflicts of interest and/or the appearance of conflicts.
7. Use our resources responsibly.
Applications of the Standards of Conduct

This section includes examples of how the standards of conduct of Catholic Health Initiatives apply to daily activities within the organization. As you read, keep the following questions in mind:

- Are my decisions and actions based on the mission and core values of Catholic Health Initiatives?
- Do I show values-based behavior at work?
- Do I make decisions with sound judgment and common sense?
- Do I communicate with honesty?
- Am I doing anything I would be concerned about if it was on the front page of a newspaper?
- Have I been asked to do something that may be dishonest, unethical or illegal?
- Do I make personal use of organizational assets or know others who do?
- Have I shared confidential patient/resident information with people not directly involved in the patient’s/resident’s care, or in a public place where others may have overheard me?
- Have I shared confidential business information with a competitor or potential supplier, vendor or contractor?

Our Values and Ethics at Work Reference Guide does not cover every decision-making situation. It provides general guidelines on acceptable and ethical business practices. Please talk with your manager or local corporate responsibility officer if the following examples and applications of the standards of conduct are not clear to you.
Anti-Kickback and Stark Self-Referral Law

Anti-Kickback Law

The federal anti-kickback law prohibits us from requesting, accepting, paying or offering to pay anything of value for referred business that is payable by a federal healthcare program. In short, we may not directly or indirectly pay patients, physicians or other healthcare providers to refer patients to us. The law is complex and has limited exceptions. Many states have similar laws. Avoid any conduct that violates, or appears to violate, federal or state anti-kickback law.

What are “kickbacks?”

Kickbacks are gifts, gratuities or anything of monetary value given to or from someone with the expectation or understanding that they will make referrals to us. Examples include:
- Gifts and incentives given with an expectation of future referrals or as a reward for past referrals.
- Free supplies or equipment.
- Excessive discounts (other than those defined in the charity care or other discount policies of Catholic Health Initiatives or its organizations).
- Written-off accounts receivable (other than those defined by policy guidelines).

What types of incentives may be considered inappropriate to offer to physicians?

Examples include:
- Anything of monetary value given with an expectation of future referrals or as a reward for past referrals.
- Providing office space at less than fair market value.
- Providing non-employed physicians with items or services free of charge or at less than fair market value (for example, hazardous waste disposal service).
- Writing off a physician’s accounts receivable or recruitment loan.

Dr. Jones occasionally sends patients to our hospital. He said he would send us more patients if we provide him with free office space. Can we do this?

No. We must charge the physician fair market value for office space. Free or discounted lease arrangements may appear to be an incentive for referrals from the physician.
Stark Self-Referral Law

The federal Stark Self-Referral Law prohibits a physician from referring Medicare/Medicaid patients to a health care provider if the physician (or an immediate family member of the physician) and provider have any type of financial relationship. However, referrals are permitted if the financial relationship is structured to comply with certain exceptions to the Stark Law. If the relationship does not comply with an exception, (1) the physician cannot refer patients, and (2) the provider cannot bill for services provided to those patients. The Stark Law is complex and numerous exceptions exist. Many states have similar laws.

Q A physician provides medical director services to our hospital and is paid for these services. Under the Stark Law, does this result in a financial relationship?

A Yes. For purposes of the Stark Law, a financial relationship occurs whenever anything of economic value is transferred between a hospital and a physician (or one of a physician's immediate family members). Thus, a written contract must exist and be structured to comply with an exception under the Stark Law.

Use the Catholic Health Initiatives reporting process, detailed on page 44, whenever you have a question about the Stark or Anti-Kickback laws.
Antitrust Compliance

We comply with laws that regulate competition in health care and avoid activities that are anti-competitive. We may not exchange information that can affect competitiveness with vendors, competitors or other business partners. Examples of actions prohibited by antitrust laws include:

- Agreeing with competitors to fix prices.
- Boycotting or participating in certain exclusive arrangements.
- Agreeing with competitors to fix wages or divide markets.
- Bribery, deception, intimidation and other unfair trade practices.

My friend works in human resources at another hospital in my city. He wants to do a survey of health care salaries. May I share salary information with him?

No. Sharing salary information may appear to be an effort to fix wages and limit competition in the marketplace.
Federal and state laws control third-party billing for patients, residents and others in our care. We submit accurate, complete and timely claims for payment. We could be prosecuted and/or asked to refund payments for filing inaccurate or fraudulent claims. Clinical, nursing, medical record, billing and/or coding employees and others responsible for creating charges must:

- Ensure that their work is accurate, complies with Catholic Health Initiatives' and its organizations’ policies, complies with federal and state laws and regulations and is completed on a timely basis.
- Bill only for services provided and appropriately documented, using accurate billing codes.
- Immediately notify a manager, a local corporate responsibility officer or the national corporate responsibility officer of inaccuracies so they can be corrected.
- Retain billing and medical record data as required by law and Catholic Health Initiatives’ and its organizations’ record retention policies.

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 the services were provided to the patient.

Q: Can we perform services for patients who are not registered in our patient registration system?
A: No. All services must be documented and appropriately billed, so all patients must be registered.
We just hired a new employee in our department. The day she started we were still waiting for her system and application credentials so she could begin her work assignments. She asked me to share my username and password with her so she could begin her new assignment. What should I do?

The situation you describe is against the Information Technology Security Standards and Policies of Catholic Health Initiatives. Discuss with your manager your concerns about sharing your password with the new employee. Ask your manager to inquire if information technology staff could speed up the process of assigning a password to the new employee.

My department is understaffed and in order not to fall behind in my assignments, I sometimes take work home. May I copy confidential data (patient, employee and/or business data) on a portable storage device or laptop computer for this purpose?

There are times when this may be appropriate. First, obtain approval from your manager before copying any data.
Confidential Information

In fulfilling our duties, we see a wide range of confidential information. Within Catholic Health Initiatives, confidential and proprietary information includes any information that is not disclosed to individuals outside the organization or that could be useful to competitors. This information takes many forms, including paper records, electronic records and verbal discussions. Sharing this information improperly can harm our mission, individuals in our care and our business partners. We have implemented specific policies and procedures to maintain and protect the confidentiality of patient, resident, employee and organizational information. Feel free to use the Catholic Health Initiatives reporting process, detailed on page 44, if you have any questions or wish to report any concern.

Q I work in housekeeping and have access to my pay stubs using my computer at home. Why do I have to type in a password to obtain my pay stub information? How can I be expected to remember my password, especially if I have to change it periodically?

A Because your pay and personal information are confidential, passwords are necessary in order to protect the information from being viewed by others. Requiring you to change your password periodically provides you with additional protection. It makes it more difficult for unauthorized users to get access to your information.

The following guidelines will help you create or change a password.

Your password should contain:
- At least six (6) characters.
- At least two (2) numbers.
- At least four (4) letters.

Your password should not contain:
- Your username.
- Your first or last name.
- Dictionary words.
- Easily identifiable information, such as your phone number, address or birth date.

The following are examples of passwords that are complex, yet easy to create and remember.

- Ih2ca1d (I have 2 cats and 1 dog).
- UKimn1t2 (UK is my number 1 team too).
Patient/Resident Information

Individuals in our care expect us to maintain the confidentiality and security of their health information. We follow the standards of the Health Insurance Portability and Accountability Act of 1996 (HIPAA) and state privacy and confidentiality laws. Breaking these laws may result in civil or criminal penalties for Catholic Health Initiatives and/or the responsible individuals. We do not use, disclose or discuss patient/resident-specific information with others unless it is necessary to provide care or is required by law or written authorization. The employees, affiliated physicians and health care partners of Catholic Health Initiatives are permitted to use or disclose protected health information (PHI) only to serve patients/residents. Report improper use, access to or disclosure of confidential PHI by using the Catholic Health Initiatives reporting process, detailed on page 44.

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 Physicians and their families, like others, are entitled to have their health information kept confidential. The situation you describe is against the confidentiality policies of Catholic Health Initiatives. Discuss the issue with your manager. Feel free to use the Catholic Health Initiatives reporting process to report any concern.

Q As an employee of a Catholic Health Initiatives’ organization, can I look at my own medical information?
A No, unless you request access following the same procedures required of any patient. Being an employee does not give you greater access rights.

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 may not access medical information without proper authorization from the patient. Being an employee does not give you greater access rights.
Employee Information

We keep employee information confidential, following human resources policies. This includes wage and salary information, employment agreements, Social Security numbers, 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 in strict confidence and may not share it with anyone who does not have a legitimate business purpose for the information. If you have any questions, use the Catholic Health Initiatives reporting process, which is detailed on page 44.

Confidential Information About Our Business

We maintain and protect the confidentiality of our proprietary information. This includes information about our competitive position, business strategies, contract terms or negotiations, payments, reimbursements and negotiations with employees or outside organizations. We ensure that proprietary information is used only for legitimate business purposes. Such information must not be inappropriately disclosed, even if your employment or association with Catholic Health Initiatives ends.

Competitive information obtained in violation of a covenant not to compete, a prior employment agreement or other contract may not be used to conduct business on behalf of Catholic Health Initiatives or its organizations.

Q Before coming to work at the hospital, I consulted for a competitor and obtained information that would help the hospital negotiate contracts. Should I share this information?

A No. Do not disclose confidential information learned through another job. We may not use this type of information in any business dealings. It would also be unethical to share confidential information learned during your employment with Catholic Health Initiatives with a future employer.
Conflicts of interest occur when personal interests or activities influence, or appear to influence, our ability to act in the best interest of Catholic Health Initiatives. Actions or relationships that could create a conflict of interest must be disclosed in advance and approved according to the policies of Catholic Health Initiatives and its organizations. Avoid situations in which your personal interests conflict or appear to conflict with the interests of the organization.

**Contractor/Vendor Relations**

Business relationships with contractors must be conducted fairly and in the best interests of Catholic Health Initiatives and its organizations. Avoid personal ties to or bias towards contractors. Use the Catholic Health Initiatives reporting process to: (1) ask questions if you are concerned about a contractor relationship and (2) report attempts by contractors to inappropriately influence business activities.

**Q** My sister-in-law is a health care 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, do not use your position to influence a decision to hire your relative. Do not share information with your relative that other prospective vendors would not have.

**Requesting and Accepting Gifts and Gratuities**

Do not request or accept gifts from a business source that could influence your decisions or create the impression of influence over your decisions. Do not request or accept personal gifts of cash or cash equivalents from any business source. Use the policies of Catholic Health Initiatives and its organizations to determine whether a gift is appropriate for your particular situation.
Q Why can’t I accept some gifts from business sources?
A While gifts from business sources are commonly accepted in some industries, healthcare is different. Because federal government programs pay for healthcare services with taxpayer dollars, federal laws regulate financial relationships between healthcare providers and business sources.

Q What type of gifts may I accept from a business source?
A Gifts of minimum value are acceptable, such as T-shirts; promotional pens or office supplies; and flowers, fruit, candy or other small, perishable gifts. Gifts that primarily benefit patients may be acceptable if they are not of substantial value: for example, a stethoscope for use in an examination room. Gifts given to a department as a whole or in the form of scholarships, grants or educational funds are generally acceptable. A reasonably priced meal provided in conjunction with a business meeting is generally acceptable.

Q What types of gifts should I refuse?
A Do not accept cash or cash equivalents. In addition, do not accept any non-cash gift of more than minimal value. Do not request or accept gifts from a business source that is in the process of conducting business with your organization, or in any situation in which business is conditional on the receipt of a gift. Reasonably priced meals provided by a business source when conducting business are allowed. Do not ask patients, residents or members of their families for gifts.

Q Can a business source sponsor a meeting that is not related to its products or services?
A Yes. A meeting organizer or representative of your organization may ask a business source to contribute some of the cost of a regional or national meeting, such as meeting facility fees or a lunch for attendees. However, the individual or the business source may not make the sponsorship a condition of starting or continuing a business relationship.

Q Can I ask a vendor, supplier or other business associate to donate to a department celebration?
A Yes. It is generally okay to allow a vendor, supplier or other business associate to contribute to a celebratory event. For example, after auditing patient records, the contracted audit firm might sponsor a small party for hospital employees who assisted with the audit; or, a vendor might donate a gift to the nursing staff during “Nurses Week.”

Q May I accept a gift from a patient, resident or a member of his/her family?
A You may accept small gifts from patients, residents or their family members in the form of perishable or consumable goods (candy, fruit baskets, flowers, etc.). Perishable or consumable gifts from a patient, resident or family member should be shared with your co-workers. Never accept cash or cash equivalents from patients, residents or members of their families.
Outside Interests and Activities

If you own or have any type of employment or consulting relationship with an outside organization from which we buy goods or services, the situation must be reviewed by your manager because of a possible conflict of interest. Conduct any outside consulting or other business activities on your own time. These activities must not conflict with or affect your work performance. If you are employed elsewhere, you must report the name of the employer and the type of employment to your manager, who can determine if there is a conflict of interest.

As a representative of Catholic Health Initiatives or one of its organizations, do not provide testimonial statements or endorsements for use in a vendor’s or contractor’s advertisement, brochure or other marketing material. Do not speak on behalf of Catholic Health Initiatives or your local organization unless you have written approval from your local corporate responsibility officer.
Q I do consulting work for a non-compet-ing company. When I am not busy at work, I type my consulting reports on a hospital computer. Is this okay?

A No. Computers and other technology resources are the property of Catholic Health Initiatives or its organizations. Users are given access to technology resources to help them perform their jobs. Occasional personal use of technology resources is allowed if it does not (1) interfere with the user’s work, (2) interfere with any other user’s work or (3) violate any policy of Catholic Health Initiatives or its organizations. For example, an employee may use a laptop computer to check personal e-mail while on a business trip.

Q I sometimes need to conduct personal business on work time. Is this okay?

A Infrequent telephone calls for personal reasons are okay; however, such calls should be of limited length and should not interfere with your job. Personal long-distance calls should not be charged to Catholic Health Initiatives or your local organization.

Q I am an employee of a Catholic Health Initiatives’ organization. To earn extra money, I sell cosmetics and candles. Can I advertise my business on company e-mail or post an advertisement on the bulletin board in my department?

A No, because Catholic Health Initiatives and its organizations are charitable, tax-exempt organizations. 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.

Q It’s Girl Scout cookie time. May I take the cookie order sheet to work to help out my daughter?

A Consult your organization’s policies and procedures for specific guidelines. Catholic Health Initiatives and its organizations limit such activities on their premises because they can interfere with business operations. In general, you may leave pre-approved, non-profit literature such as a Girl Scout cookie order form (Girl Scouts is a non-profit organization) on a table in a break room or other designated area as defined in your organization’s policies. You should not directly solicit employees on company premises or use company resources such as e-mail, telephone, etc.
Participation on Outside Boards of Trustees/Directors

Catholic Health Initiatives encourages us to be active in our communities. This may include serving on the boards of charitable and civic organizations. When serving on such boards:

- Obtain management approval before serving on the board of any organization that may conflict with the interests of Catholic Health Initiatives or its organizations.

- Do not vote on matters that might affect the interests of Catholic Health Initiatives or its organizations.

- When speaking as a board member, do not identify yourself as speaking on behalf of Catholic Health Initiatives or its organizations, unless you have written approval from your local corporate responsibility officer.

- Consult management or human resources before accepting payment from an outside group for services performed during regular work hours.

Catholic Health Initiatives and its organizations retain the right to prohibit membership on any outside board.

Q I am a board member of a local company that does business with Catholic Health Initiatives. Will I need to resign from the board?

A Your involvement on the board may be a conflict of interest. Discuss the situation with your manager or local corporate responsibility officer to determine whether this is a conflict of interest and, if so, whether you should resign.
Copyrighted, Trademarked or Licensed Materials

Copyrighted, trademarked or licensed materials may not be copied or used without written permission. Do not use or copy any customer, supplier or employee contract, document, publication, computer system, software, information or product if it violates a third party’s property right.

Q I recently attended a conference and received a notebook of material that will benefit my department. May I make copies of the information for co-workers?

A If the materials are copyrighted, do not copy them without written permission from the license holder. You may summarize the information for your co-workers or let them use the original materials.

Q Some employees have loaded personal software on their computers at work. Is this okay?

A No. Unlicensed software is forbidden on any computer that belongs to Catholic Health Initiatives or one of its organizations. Copying licensed software without written permission is illegal and may result in financial penalties. Unlicensed software on a computer owned by Catholic Health Initiatives or one of its organizations must be removed as soon as possible. If an employee refuses to remove the software, report the situation using the Catholic Health Initiatives reporting process, detailed on page 44.
Dealing with Government and Regulatory Agencies

We respond to federal, state or local government requests for information on a timely basis and in a cooperative manner while preserving our organization’s legal rights. If a government agent approaches you or you receive a subpoena, either at work or at home, you should:

- Be calm and respectful.
- Ask for identification and verify the authority of the agent.
- Immediately call the following persons, in the order given, until you reach one of them:
  - Local corporate responsibility officer or designee
  - Manager or administrator on call
  - National corporate responsibility officer, 1-303-383-2730
  - Catholic Health Initiatives’ legal counsel
  - Ethics at Work Line, 1-800-261-5607

If a government agent asks to speak with you, you may volunteer to talk with the agent but are not required to do so. Do not feel frightened or pressured to speak with a government agent without first contacting one of the people listed to the left. You may ask to have a representative or legal counsel from Catholic Health Initiatives or your local organization attend any interview with a government agent.

If a government agency conducts an interview or investigation, do not:

- Alter, remove or destroy documents or records belonging to Catholic Health Initiatives or its organizations, including paper, electronic or computer records.
- Lie or make false or misleading statements.
- Persuade any employee or other person to provide false or misleading information or to fail to cooperate.
- Offer any item of value to a government official, which may be interpreted as a bribe.

Refer to the policies of Catholic Health Initiatives and its organizations for more information on responding to government investigations.
Q I received a telephone call from someone who said he was a government investigator. He asked me about our home care policies and said an investigator would come to our hospital in the next few weeks. I did not give him any information. What should I do if an investigator does come to the hospital?

A You were right not to give any information on the telephone, because you could not verify the caller’s identity. If an investigator comes to your department, ask for identification. Then, contact your local corporate responsibility officer and your manager before you decide to speak with the investigator. The national corporate responsibility officer and Catholic Health Initiatives’ legal counsel must be notified and will provide instructions on how to proceed.

Q A woman who said she worked with Medicare came to my home. She said I had to answer her questions. I refused and asked her to leave. What should I do if this happens again?

A When someone says he/she is a government agent, always ask for identification. That is your right. You may also refer the agent to your organization’s leadership. Then, contact your local corporate responsibility officer, your manager, the national corporate responsibility officer and Catholic Health Initiatives’ legal counsel for instructions on how to proceed.

Q An Internal Revenue Service agent conducted an investigation in our facility for several weeks. When he finished, we gave him a little party. Was that appropriate?

A No. Do not provide courtesies to any government employee. You or your manager must immediately report this incident using the Catholic Health Initiatives reporting process. Although you were simply being friendly, the party could be seen as a bribe.
We are responsible for the accuracy of our organization’s documents and records. Complete documentation helps us comply with regulatory and legal requirements and supports our business practices.

Corrections to documents and records must be made according to the guidelines and policies of Catholic Health Initiatives and its organizations, as well as applicable laws and regulations. Line through, initial and date incorrect entries. Do not use correction materials to remove an original entry in a legal document. Correcting documentation and errors in electronic records requires specific procedures. Review your organization’s information technology policies and procedures for assistance in correcting electronic records.
Business and Financial Records

Financial and accounting records (including cost and research reports, time sheets, mileage reimbursement reports, expense reports and other documents) must be accurate. Sign and date business and financial documents as appropriate. Fraudulent documentation, accounting and financial reporting are illegal. In addition, inaccurate or improper documentation, accounting and financial reporting may be illegal.

Medical Records

We are responsible for accurate and timely documentation of services provided to individuals in our care. Ensure that medical records meet the requirements of all medical staff bylaws, accreditation standards and relevant laws and regulations.

Q Clinicians on our unit sometimes perform a service or provide treatment to a patient but do not document it in the chart until later. Is this okay?

A Documentation should always be accurate and completed on a timely basis. A delay in documentation may jeopardize patient care and could impact our ability to receive payment from a federal or state healthcare program. We are obligated to follow our organization’s policies and procedures, bylaws and all applicable federal and state laws regulating documentation.
Emergency Medical Treatment and Active Labor Act (EMTALA)

We follow the federal Emergency Medical Treatment and Active Labor Act (EMTALA), sometimes called the “Anti-Dumping Law.” Numerous states have also enacted EMTALA-like laws, some of which are more stringent than the federal law. These laws must be followed by Catholic Health Initiatives’ organizations. The federal law requires hospitals with a dedicated emergency department to provide a medical screening exam to any individual who comes to the emergency department. In addition, necessary stabilization must be provided within the capability of the staff and facility for patients determined to have an emergency medical condition.

EMTALA also applies when the need for emergency care is apparent or requested by an individual on the hospital’s property outside of the dedicated emergency department. Catholic Health Initiatives’ organizations may not delay medical screening exams or stabilization to obtain financial or demographic information from the patient. Catholic Health Initiatives’ organizations may only transfer unstable patients with an emergency medical condition to another facility if: (1) the patient requests the transfer and has been informed of the hospital’s obligation and the risks and benefits of transfer; or (2) a physician certifies that the medical benefits provided at another facility are reasonably expected to outweigh the increased risks involved with the transfer. Feel free to use the Catholic Health Initiatives reporting process, detailed on page 44, if you have any questions or wish to report any concern.
Q: Does the EMTALA law permit us to register an emergency room patient before we perform a medical screening examination and stabilization procedures?

A: You may register a patient first only if the process does not: (1) delay the medical screening examination and any necessary stabilization treatment; or (2) include questions about the patient’s method of payment or ability to pay. You may ask the patient if he/she has insurance and the name of the carrier provided that the questions do not delay screening or treatment. Reasonable registration processes should not discourage the patient from remaining in the emergency room for further evaluation. Catholic Health Initiatives’ organizations shall not request prior authorization from managed care plans before completing a medical screening exam or beginning stabilizing treatment. Any further questions about financial information must wait until after the medical screening examination and necessary stabilization have occurred. Only employees trained in EMTALA regulations and hospital procedures should register the patient.

Environmental Responsibility

We are committed to being good stewards of the environment. We recognize that our well-being, and the well-being of future generations, depends upon our reverence for the environment. We should, whenever possible, conserve our natural resources, recycle, reduce waste and pollution, promote energy efficient technologies, eliminate toxins and use environmentally preferable purchasing. We comply with environmental laws and regulations for health care pollutants.
Employees and individuals associated with a Catholic Health Initiatives’ organization are required to abide by the *Ethical and Religious Directives for Catholic Health Care Services*. You may hear this document referred to as the “directives” or the “ERDs.”

Originally written in 1981, the directives have been revised over the years to respond to new developments in medical science and technology. The United States Conference of Catholic Bishops states that the purpose of the directives is to reaffirm the ethical standards of behavior in health care that flow from the Church’s teaching about the dignity of the human person. These directives also provide guidance in applying the moral teachings of the Catholic Church when handling select ethical issues in health care.

The current edition of the directives is divided into six parts. They are:

- **The Social Responsibility of Catholic Health Care Services**—Catholic health care is a ministry of the Church called to care for persons who are poor and to contribute to the common good of the community.

- **The Pastoral and Spiritual Responsibility of Catholic Health Care**—A Catholic health care institution is a community of healing and compassion, embracing the physical, psychological, social and spiritual dimensions of the human person.

- **The Professional/Patient Relationship**—Catholic health care nurtures a truly interpersonal professional/patient relationship that requires mutual respect, trust, honesty and appropriate confidentiality.

- **Issues in Care for the Beginning of Life**—Catholic health care ministry is rooted in a commitment to respect the sacredness of every human life from the moment of conception to death.

- **Issues in Care for the Dying**—A Catholic health care institution provides compassionate care and related relief of pain and suffering for the dying.

- **Forming New Partnerships with Health Care Organizations and Providers**—Catholic health providers, when forming new partnerships with other health care organizations, should require systematic and objective moral analysis and respect Church teaching.

For more information regarding how the directives apply to you and your position, please contact your local mission leader or Ethics Committee chair.
Ethical Behavior

We value open, honest communication and ethical decision-making. We communicate with candor and honesty when performing our jobs. We seek out information and resources when faced with operational and ethical dilemmas.

Q What resources can help me address issues of clinical, organizational and social ethics?
A Your organization has resources for dealing with ethical issues. Your organization’s Ethics Committee provides a forum for dealing with clinical ethics. The senior leadership team is your point of contact for organizational ethics. Your board of directors provides oversight for social ethics.

Q Do we have a standard way of making ethical, values-based decisions?
A Catholic Health Initiatives has its own decision-making process, which includes seven steps and is used by clinicians, managers and board members. You can use this process to make values-based decisions. The Catholic Health Initiatives Discernment Process is available from your senior leadership or mission group.

Excluded Providers

The federal government will not pay for services provided by an individual or entity that the government has excluded from participating in a federally funded health care program. We do not knowingly employ, conduct business with or contract with excluded providers. Catholic Health Initiatives and its organizations conduct pre-employment, pre-contracting, pre-credentialing and annual excluded provider status checks on individuals and entities associated with us. Excluded providers are not eligible to be employed by or to contract with Catholic Health Initiatives or its organizations. Any employee or contractor found to be an excluded provider will be terminated. Any revenue and costs associated with the excluded provider will be appropriately handled so that the federal health care program does not pay for these services.
Catholic Health Initiatives and its organizations are required by law to establish certain policies and provide employees, agents and contractors with information regarding: (1) the federal False Claims Act and similar state laws, (2) an employee’s right to be protected as a whistleblower, and (3) national and local policies and procedures for detecting and preventing fraud, waste and abuse. Our Values and Ethics at Work Reference Guide establishes our policies and contains information required by law under Section 6032 of the Deficit Reduction Act of 2005.

**What is the Federal False Claims Act?**

The federal False Claims Act (31 USC § 3729-33) helps the federal government combat fraud and recover losses resulting from fraud in federal programs, such as Medicare and Medicaid. A person or entity violates the False Claims Act by “knowingly:” (1) submitting a false claim for payment, (2) making or using a false record or statement to obtain payment for a false claim, (3) conspiring to make a false claim or get one paid, or (4) making or using a false record to avoid payments owed to the U.S. government. “Knowingly” means that a person: (1) has actual knowledge that the information is false, (2) acts in deliberate ignorance of the truth or falsity of the information, or (3) acts in reckless disregard of the truth or falsity of the information.

Examples of potential false claims include:

- Billing for services that were not provided at all.
- Billing for services that were provided, but were not medically necessary.
- Submitting inaccurate or misleading claims about the type of services provided.
- Making false statements to obtain payment for products or services.

The False Claims Act contains provisions that allow an individual who has original information concerning fraudulent activities
involving government programs to file a lawsuit on behalf of the government. If the lawsuit is successful, the individual may be eligible to receive a portion of the recoveries received by the government.

Penalties for violating the federal False Claims Act are significant. Financial penalties for submitting a false claim can total as much as three times the amount of the claim, plus fines of $5,500 to $11,000 per claim.

**What is a State False Claims Act?**

In addition to the federal False Claims Act, many states have adopted or are in the process of adopting false claims acts. You are encouraged to periodically visit the Catholic Health Initiatives Web site at [www.catholichealthinitiatives.org](http://www.catholichealthinitiatives.org) for detailed information regarding your state’s False Claims Act. Once you have accessed the Web site, type “state summaries” using the search feature to access the direct link.

**Rights of Employees to be Protected as Whistleblowers Under the False Claims Act**

Federal and many state false claims acts protect employees from retaliation if they, in good faith, report fraud. Employees are protected against retaliation such as being fired, demoted, threatened or harassed as a result of filing a false claims act lawsuit. An employee who suffers retaliation can sue, and may receive up to twice his/her back pay, plus interest; reinstatement at the seniority level they would have had if not for the retaliation; and compensation for costs or damages.

Please contact your local corporate responsibility officer if you have any questions regarding false claims acts or the Corporate Responsibility Program.
Marketing Practices

Catholic Health Initiatives and its organizations provide reliable, responsible sources of information about health care to the community. Marketing, communications, fund raising and advertising activities can educate the community about health issues, increase awareness of our services and facilitate employee recruitment. Catholic Health Initiatives and its organizations:

- Present truthful information to the public in all marketing, communications and advertising materials.
- Distinguish opinion from fact when presenting issues.
- Take care not to exploit the fears of patients, residents or their families in our marketing, communications, fund raising and advertising activities.
- Comply with applicable federal and state law for marketing and advertising activities, including any marketing and advertising activities provided for non-employed physicians or physician groups.

Two oncologists who are not employees of the hospital just joined the medical staff to provide a new service. We would like to send an announcement to the community to highlight this new service. Is this a permitted marketing practice?

Yes, this is generally acceptable. However, this type of announcement and the actual cost of the advertisement must meet an applicable legal exception and financial limits under federal law. Consult your local corporate responsibility officer or Catholic Health Initiatives’ legal counsel to determine the applicable federal exception and the restrictions that apply to non-employed physician and physician group advertising and marketing activities.

Non-Retaliation

Catholic Health Initiatives and its organizations promote an environment that encourages all of us to seek clarification of issues and report questions and concerns. It is our duty and responsibility to report possible violations of our standards, guidelines or policies. You will be protected from retaliation if you make a good-faith report, complaint or inquiry. A person who retaliates against you for making a good-faith report is subject to discipline, up to and including dismissal from employment or termination of a business relationship with Catholic Health Initiatives or its organizations. Non-retaliation policies do not protect you if your actions violate the policies of Catholic Health Initiatives or its organizations or applicable laws.
Patient Care and Rights

We deliver quality patient care without regard to race, color, religion, gender, sexual preference, national origin, citizenship, age, disability, payer source or ability to pay. We treat every person in our care with dignity and respect. Our commitment to quality and service is shared by board and committee members, employees, officers, volunteers, medical staff and other representatives of our organization. Our commitment to our distinctive Catholic culture enables us to obtain desired outcomes.

We respect the rights of each individual in our care. We provide individuals in our care with information regarding their rights and responsibilities, and we endeavor to protect those rights. Individuals in our care have the right to accurate, timely information about their health, payment options (including charity care) and other information that helps them make decisions about their treatment. It is our responsibility to provide this information. Please refer to your organization’s guidelines for a description of patient rights.

Q To whom should I report quality of care issues?
A Such issues include many aspects of care and should first be discussed with your manager. More serious issues may need to be evaluated by the Quality Department, the Risk Management Department or the Patient Grievance Committee. If you believe the quality of care issue is not being adequately addressed, use the Catholic Health Initiatives reporting process, detailed on page 44.

Q If I see that a patient is not being treated with proper courtesy and respect, what should I do?
A First, ensure that the individual is not in harm’s way. Then, talk with your manager. If your manager does not provide a satisfactory response, contact your local patient advocate, quality or risk manager, or use the Catholic Health Initiatives reporting process.

Q What should I do if I know that a medical error has occurred? Should I tell the patient and/or family?
A Catholic Health Initiatives supports compassionate disclosure whenever an error has occurred, but the disclosure must take place in a coordinated manner. Contact your manager and your quality or risk management director to ensure the disclosure is handled within your organization’s prescribed process.
The tax-exempt status of Catholic Health Initiatives and most of its organizations carries certain restrictions on political activities. While we engage in many advocacy efforts, there are limits on our legislative activities because of our tax-exempt status. Participation in political campaigns is not permitted, and substantial legislative activity at local, state or federal levels could jeopardize our tax-exempt status. The Internal Revenue Service watches and investigates the political activities of tax-exempt organizations. The following guidelines provide an overview of what is and is not allowed.

**Political Activities**

**Permissible Activities for a Tax-Exempt Organization**

- Calling and/or writing letters to elected officials, legislators and government agencies to express a view on an issue.
- Visiting political leaders to provide the organization’s perspective on current and proposed legislation.*
- Providing financial or other support to organizations that sponsor ballot initiatives, referenda or similar measures.*
- Providing community opportunities (for example, public forums or debates) to raise awareness of issues and inform voters of the impact on the organization and community.
- Sponsoring non-partisan voter registration drives.
- Hosting candidates or groups of candidates, as long as all candidates for a particular office have similar opportunities to express their views and meet people within the organization.
**Permissible Activities for Employees of a Tax-Exempt Organization**

- Supporting or opposing candidates, as long as the employees do not imply they are representing Catholic Health Initiatives or its organizations or use organizational resources (such as telephones, office supplies and e-mail).
- Contributing personal funds to a campaign or political action committee (PAC), as long as there is no pressure from the organization to contribute and the contribution is linked to the individual, not the organization.

**Activities in Which Employees of a Tax-Exempt Organization May Not Be Involved**

- Asking people within the organization to support or oppose a candidate or contribute to a certain campaign or PAC.
- Using organizational resources to seek support for or opposition to a candidate or a contribution to a PAC.

Q My brother-in-law is running for the House of Representatives. May I use a copier at work to make campaign flyers?

A No. As tax-exempt organizations, Catholic Health Initiatives and its organizations may not contribute money or resources to political campaigns.

* These activities are considered lobbying and cannot be substantial in relation to the total activity of the organization.
Protecting our Assets

We are committed to protecting our assets, including our financial resources, supplies, equipment and reputation. We do so by making wise and ethical decisions to ensure that our assets are used to support our healing ministry. As responsible stewards of our resources, we:

- Follow *Our Values and Ethics at Work Reference Guide* and the policies and procedures of Catholic Health Initiatives and its organizations.
- Keep accurate and reliable financial records and reports.
- Ensure that our assets are used only to further our health care mission, not for our personal business or benefit. We do not use organizational equipment, supplies, materials or services for unauthorized purposes. There are many experts within Catholic Health Initiatives and its organizations who provide education at external work-related functions. If you speak at an external function during work time and receive payment, you must submit the money to the organization's foundation or designated department.
- Use good judgment when using our assets for business travel and entertainment.
- Use the Catholic Health Initiatives reporting process, detailed on page 44, if we have questions about the proper use of organizational assets.
Record Retention

All clinical, financial and employee records of Catholic Health Initiatives and its organizations are stored according to record retention policies. You can request a copy of your organization’s policy from management or your local corporate responsibility officer.
Tax-Exempt Status

Catholic Health Initiatives and its organizations are nonprofit, tax-exempt and operated solely for religious and charitable purposes. This status provides Catholic Health Initiatives and its organizations certain benefits in support of building healthy communities. To keep our tax-exempt status, we use our resources to further the religious and charitable purposes of our mission. Tax laws prohibit our tax-exempt organizations from:

- Paying more than fair market value for services, products or leases.
- Taking part in a joint venture, partnership or similar transaction that results in an improper private benefit (gain) to a third party.
- Recruiting physicians with incentives or compensation plans that are in excess of fair market value or do not serve an identified community need.
- Accepting research grants from third parties when the researcher keeps the funds for personal use or the Catholic Health Initiatives organization is not paid for the use of our time, equipment or facilities in connection with research.
- Providing a service at less than fair market value, unless exceptions exist under organizational policy or federal or state law. Examples include services provided to Medicare and Medicaid beneficiaries under managed care contracts and discounts provided under charity, prompt pay or other policies. Courtesy discounts and other uncompensated benefits to physicians, officers, directors and trustees, other than those provided for by organizational policy, are prohibited.
- Permitting any person to buy, sell, lease or use organizational property at less than fair market value.
Our Values at Work

We are committed to enabling all employees to reach their fullest potential by:

- Providing meaningful, rewarding work with competitive pay and benefits.
- Ensuring a safe, supportive work environment.
- Providing the opportunity to learn and grow.
- Sharing information about the performance of Catholic Health Initiatives and its organizations.
- Encouraging innovation and achievement.
- Hiring and developing values-based leaders and employees.
- Recognizing employee contributions and celebrating success.
- Supporting a healthy balance of work and personal life.
- Complying with laws that regulate employment and the workplace environment.

Together, as a values-driven work community, we can fulfill our mission to bring new life, energy and viability to our health care ministry today and in the future.

Credentialed Provider Qualifications

We retain appropriately licensed and credentialed individuals to provide patient care. Each individual is responsible for performing his/her job duties within the scope of his/her licensure and practice authority.

Exit Interviews

Employees who leave the organization are encouraged to conduct exit interviews with human resources. Information that you provide in an exit interview helps Catholic Health Initiatives and its organizations identify and resolve workplace problems and increase employee satisfaction and retention. An exit interview allows an employee to report in good faith any situation he/she believes is contrary to our standards of conduct and is important for us to know.
If you are unsure about how to respond to a particular situation, this section of the *Our Values and Ethics at Work Reference Guide* provides guidance.

**Reporting Concerns**

As an organization and as individuals, we are responsible for promptly reporting potential violations of law, regulation, policy or procedure. You are protected from retaliation if you make a good-faith report, complaint or inquiry. For more information on Catholic Health Initiatives’ non-retaliation policy, see page 36. The Catholic Health Initiatives reporting process is described below.

Catholic Health Initiatives Reporting Process:

- Speak with your supervisor or another manager.
- If the supervisor/manager is not available, or you are not comfortable speaking with him/her, or you believe the matter has not been adequately resolved, contact your human resources representative or your local corporate responsibility officer.
- If you want to report a concern anonymously, you have two options:
  - Call the Ethics at Work Line phone number, 1-800-261-5607.
  - File your report using the Internet at www.ethicspoint.com.
    - Click on “File a New Report.”
    - Enter “Catholic Health Initiatives” in the “Enter Organization Name” box and submit. You will be directed to Catholic Health Initiatives’ client site.
Both of these confidential reporting options are available 24 hours a day, seven days a week. Reports made by phone or the Internet are received by trained staff who document and forward information to your local and/or national corporate responsibility officer for appropriate action. These reports are not traced or recorded. You may remain anonymous if you wish. If you choose to identify yourself, there is no guarantee that your identity will remain confidential. However, when you identify yourself it is easier for the corporate responsibility officer to provide you with a direct response.

**Training and Education**

Comprehensive training and education is available to help you understand and comply with our expectation that you conduct yourself ethically and responsibly. This education and training is provided at the time you join the organization. In addition, many employees receive annual specialized training on subjects such as billing, coding, confidentiality, safety, environmental issues and regulations that relate specifically to their jobs.

**Consequences of Failure to Comply With Our Values and Ethics at Work Reference Guide**

As a minimum standard, all persons associated with Catholic Health Initiatives or its organizations will conduct their activities in compliance with applicable laws. We have a duty to act in a manner consistent with our core values, policies and the *Our Values and Ethics at Work Reference Guide*. We are subject to a variety of serious consequences if we fail to comply with laws, regulations and organizational policies and procedures. The consequences to Catholic Health Initiatives and/or its organizations may include risks to patient/resident safety, refund of payments from government programs, civil or criminal liability, exclusion from federal payment programs and loss of tax-exempt status. In addition, responsible individuals may be subject to disciplinary action, including suspension or termination of employment, termination of contractual relationship or removal from office or board membership. Individuals may also be prosecuted and subject to substantial fines.
Contact your local corporate responsibility officer or other personnel when you have questions regarding *Our Values and Ethics at Work Reference Guide* or wish to review organizational policies. The list below summarizes the types of concerns typically addressed by specific personnel within Catholic Health Initiatives' organizations. If your concern is not listed below, contact your local corporate responsibility officer for assistance.

### Types of Issues Addressed by the Corporate Responsibility Officer
- Corporate Responsibility Program orientation, education and training
- EMTALA
- Stark law
- Anti-kickback law
- Antitrust compliance
- False Claims Act
- Tax-exempt status
- Billing issues
- Improper or incorrect documentation for billing
- Non-compliance with *Our Values and Ethics at Work Reference Guide* and/or other policies and procedures adopted as part of the Corporate Responsibility Program
- Falsification of records
- Fraudulent activities
- Conflicts of interest
- Contract issues
- Disclosures of confidential information
- Misuse of assets
- Compensation arrangements related to a contract
- Contractual relationships potentially involving referrals of patients/residents
- Medically unnecessary services provided to patients/residents
- Other activities that may violate federal, state or local law; statutes; regulations; guidelines; or rules that govern the health care industry

### Types of Issues Addressed by Safety Personnel
- Occupational Safety and Health Administration (OSHA) issues
- Ergonomics
- Workplace safety
- Workplace violence

### Types of Issues Addressed by Human Resources Personnel
- Employee Retirement Income Security Act (ERISA) issues
- Sexual, racial or other harassment
- Equal Employment Opportunity and discrimination issues
- Staff rights
- Unemployment
- Employment practices
- Employment disputes/grievances

### Types of Issues Addressed by Ethics Resource Persons/Risk Management/Nursing/Pastoral Care
- Advance Directives
- Disrespect of patients/residents
- End of life issues
- Patient rights
- Ethical and Religious Directives
- Patient grievances
- Clinical issues/quality of care concerns

### Types of Issues Addressed by Americans with Disabilities Act issues
- Illegal or abusive alcohol and drug use
- Labor relations/union issues
- Workers’ Compensation issues and medical disability issues
- Weapons and violence in the workplace
- Gambling in the workplace
- Unexcused absences or repeated tardiness
- Compensation
- Employee benefits
- Family and Medical Leave Act

### Types of Issues Addressed by

*Note: The list continues with additional issues not mentioned in the excerpt.*
I acknowledge that I have received a copy of Catholic Health Initiatives’ *Our Values and Ethics at Work Reference Guide* and I agree to read it completely. I also agree to discuss any questions or concerns regarding this reference guide with my supervisor or a Catholic Health Initiatives’ leader.

I certify that I will comply with the *Our Values and Ethics at Work Reference Guide* standards and guidelines and any other standards or policies set by the organization I serve that apply to me in my role throughout my association with Catholic Health Initiatives. I understand that it is my responsibility to report any concerns regarding possible violations of these standards, guidelines and/or policies. Furthermore, I understand that neither Catholic Health Initiatives nor the local organization I serve will retaliate against me for making a report in good faith.

I understand that Catholic Health Initiatives and/or its organizations will conduct an excluded provider background check prior to my employment and periodically thereafter. I understand that Catholic Health Initiatives and its organizations reserve the right to terminate my employment or other association if I am an excluded provider.

I understand that *Our Values and Ethics at Work Reference Guide* contains guidelines for behavior within Catholic Health Initiatives and its organizations and is not an employment contract. I also understand that these guidelines may be amended, modified or clarified at any time, and that I will receive periodic updates to these guidelines.

*Please Print*

Name__________________________________________________________

Department or Affiliation _________________________________________

Organization ____________________________________________________

Signature__________________________________________ Date ______________

Please complete the certification, detach this card and submit it to your training facilitator or your local corporate responsibility officer as documentation of your acknowledgment and certification as stated above.
The secret of joy in work is contained in one word—excellence. To know how to do something well is to enjoy it.”

Pearl S. Buck, American Novelist
CONCLUSION

Our core values and standards of conduct are guiding principles that help us advance the framework for ethical behavior found in Our Values and Ethics at Work Reference Guide. It is our responsibility to understand and follow these standards of conduct. Contact your manager, local or national corporate responsibility officer or the Ethics at Work Line with questions or concerns. No retaliatory action will be taken against anyone who makes a good-faith report of a potential violation of the Our Values and Ethics at Work Reference Guide.

Please become familiar with the standards of conduct defined in this reference guide. By promoting our values and ethics, we can strengthen our organization and live out the mission of Catholic Health Initiatives.

Contact Information

Local Corporate Responsibility Officer
[insert STICKER with contact information]

Local HIPAA Privacy Official
[insert STICKER with contact information]

Local HIPAA Security Official
[insert STICKER with contact information]

Catholic Health Initiatives
National Corporate Responsibility Office
1-303-383-2730

Catholic Health Initiatives
Ethics at Work Line
1-800-261-5607
If you are unsure about how to respond to a particular situation, you can use the Catholic Health Initiatives reporting process:

- Speak with your supervisor or another manager.
- If the supervisor/manager is not available, or you are not comfortable speaking with him/her, or you believe the matter has not been adequately resolved, contact your human resources representative or your local corporate responsibility officer.
- If you want to report a concern anonymously, you have two options:
  - Call the Ethics at Work Line phone number, 1-800-261-5607.
  - File your report using the Internet at www.ethicspoint.com.
    - Click on “File a New Report.”
    - Enter “Catholic Health Initiatives” in the “Enter Organization Name” box and submit. You will be directed to Catholic Health Initiatives’ client site.

See page 44 for a detailed description of the reporting process.