Ethics
AT WORK
A REFERENCE GUIDE

CATHOLIC HEALTH INITIATIVES™
A spirit of innovation, a legacy of care.
Exercise good faith and honesty in all dealings and transactions.

Create a work place that fosters community, respects the inherent dignity of every person, promotes employee participation and ensures safety and well being.

Maintain a high level of knowledge and skill among all who serve in order to provide high quality care.

Observe all laws and regulations that govern what we do.

Provide accurate and truthful information in all transactions.

Maintain and protect confidentiality of patient, resident, employee and organizational information.

Exercise responsible stewardship of human and financial resources.

Avoid conflicts of interest and/or the appearance of conflicts.
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.

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.
Catholic Health Initiatives’ core values of **Reverence, Integrity, Compassion** and **Excellence** are the 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** A culture of reverence provides the foundation for everything we are and do. Our sense of oneness with creation, with local communities and with those we serve enhances our organizational performance. The distinctiveness of our culture is grounded in a lived spirituality and personal faith. Our recognition of all life as a gift moves us to acknowledge God’s presence and power in our healing ministry and to steward limited resources carefully. Our business focus is that of healing relationships. Therefore, our daily work is not just to make a living but a ministry to make a difference in the lives of others.

**INTEGRITY** A culture of integrity characterizes the behaviors of people called to relationships that heal. The organizational measures of open communication, ethical decision-making and humility are demonstrated consistently and encouraged. Not only is doing the right thing simply how we do business and deliver care, but our communications reveal our commitment to truth telling and to how we always see ourselves from the perspective of others in a larger community.

**COMPASSION** A culture of compassion characterizes our care for the whole person, our commitment to the common good and our outreach to the most vulnerable. Work requirements are managed in a participative and person-centered way, demonstrating an ability to feel the needs of others and a commitment to act always in the best interests of all stakeholders. We are constantly working to transform the way health care is delivered and accessed in our country and beyond.

**EXCELLENCE** A culture of excellence characterizes high-performing organizations that strive to deliver the best quality care and to meet or exceed Catholic Health Initiatives’ strategic measures of success. In achieving clinical, strategic, operational and cultural priorities, our people set and accomplish goals that are challenging yet realistic. Each person benefits from the wisdom and strength of the whole organization and appropriate risk-taking is rewarded. New and better ways of delivering care, managing resources and meeting community needs consistently energize all of us.
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Catholic Health Initiatives’ commitment to corporate responsibility is tied to its distinctive culture. 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; indeed, we depend on each other to do so.

However, health care is a complex undertaking. Sometimes, the “right” way to act is unclear. Catholic Health Initiatives has created this booklet as your guide to the standards of conduct and how to apply them to the decisions you make at work.

The examples in this reference guide will help you maintain honesty, directness and respect in all your interactions with patients and residents, their family members, your co-workers and business partners. To further clarify the standards of conduct, we have included real questions posed by employees, physicians and business partners, and we have provided answers to their questions to help you.

*Ethics at Work* is designed to help you make decisions at work, however simple or difficult they may be. However, it is not possible to cover every situation that calls for ethical decision-making. If you are struggling to decide what is right, several options are available to you.

The Catholic Health Initiatives reporting process was designed to provide you with a step-by-step process for reporting any corporate responsibility concern or issue. 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 ministry of health care.

Sincerely,

Kevin E. Lofton, FACHE
President and Chief Executive Officer

Michelle Cooper
National Corporate Responsibility Officer
ETHICS AT WORK IS A REFERENCE GUIDE.
ITS PURPOSE IS TO HELP US DO WHAT IS RIGHT AND TO ENSURE THAT OUR BEHAVIOR DEMONSTRATES OUR VALUES. AT A MINIMUM, THIS MEANS OBEYING THE LAW AND AVOIDING IMPROPER ACTIVITIES.
Ethics at Work includes examples of how we can apply Catholic Health Initiatives’ standards of conduct to our daily work. These applications are arranged alphabetically by topic for ease of reference.

Ethics at Work is one of many tools that can help us do our work in a responsible, professional and ethical way. Other tools include:

- Local and national policies and procedures.
- Corporate responsibility policies and procedures.
- Compliance reference and guidance documents.
- Educational offerings including training in complicated or high-risk areas.
- Guidance from the local and national corporate responsibility officers.

Ethics at Work provides guidance for all of us as we strive to achieve our mission. By understanding and using Ethics at Work, we demonstrate our commitment to our core values.
Introduction

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.

Our distinctive Catholic ministry promotes behaviors consistent with our core values. We create structures and processes that reflect our commitment to those we serve. These structures and processes also reflect fidelity to our origins and heritage.

Catholic Health Initiatives’ corporate responsibility program 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 distinct Catholic culture. Our cultural attributes call us to:

- 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.

Catholic Health Initiatives has many programs that promote excellence, quality and responsibility. These programs are building blocks for the corporate responsibility program and *Ethics at Work*. They guide us in making the right decisions and supporting others’ efforts to do the same.

To support us in making the right decisions and getting answers to our questions or concerns, Catholic Health Initiatives has developed the following three-step reporting process:

- Speak with your supervisor or another manager.
- If a manager is not available, or you are not comfortable speaking with him or 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, call the Catholic Health Initiatives Alertline. The Alertline is a confidential service available 24 hours a day, seven days a week. **The Alertline number is 1-800/261-5607.** Calls are received by trained staff who document and forward information to your local corporate responsibility officer for appropriate action. Calls to the Alertline are not traced or recorded. Callers can remain anonymous. If callers choose to identify themselves, there is no guarantee their identities will remain confidential. However, when a caller identifies himself or herself, it may be easier for the corporate responsibility officer to provide a direct response.

We are encouraged to use this process as needed to make the right decisions and support others in doing the same.
STANDARDS of Conduct

Ethics at Work 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 must act in accordance with the following standards of conduct:

- Exercise good faith and honesty in all dealings and transactions.
- Create a work place that fosters community, respects the inherent dignity of every person, promotes employee participation and ensures safety and well being.
- Maintain a high level of knowledge and skill among all who serve in order to provide high quality care.
- Observe all laws and regulations that govern what we do.
- Provide accurate and truthful information in all transactions.
- Maintain and protect confidentiality of patient, resident, employee and organizational information.
- Exercise responsible stewardship of human and financial resources.
- Avoid conflicts of interest and/or the appearance of conflicts.
This section includes examples of how Catholic Health Initiatives’ standards of conduct apply to daily activities within the organization. As you read, keep the following questions in mind:

- 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 or resident information with people not directly involved in the patient or 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?
- Are my decisions and actions based on the mission and core values of Catholic Health Initiatives?

Although *Ethics at Work* 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 applications of the standards of conduct are not clear to you.
Anti-Kickback and Stark Anti-Referral Law

ANTI-KICKBACK LAW. Federal anti-kickback law prohibits us from requesting, accepting or offering anything of value for referred business that is payable by a federal health care program. We may not pay patients, physicians or other health care providers to refer patients to us. The law is complex and includes limited exceptions. Many states have similar laws. Avoid any conduct that violates, or appears to violate, federal or state anti-kickback law.

**Question:** What are “kickbacks?”

**Answer:** Kickbacks are gifts, gratuities or anything of monetary value given to or from someone who is in a position to influence a business decision.

**Examples include:**
- Gifts and incentives.
- Free supplies or equipment.
- Excessive discounts (outside guidelines defined in the charity care or other discount policies of Catholic Health Initiatives or its organizations).
- Written-off accounts receivable (outside policy guidelines).

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

**Answer:** Examples include:
- Anything of monetary value.
- 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.

**Question:** 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?

**Answer:** No. We must charge physicians fair market value for office space. Free or discounted lease arrangements may appear to be payment for referrals from the physician.
STARK ANTI-REFERRAL LAW. The federal Stark Self-Referral law prohibits a physician from referring Medicare and Medicaid patients to a health care provider in which the physician or his/her immediate family has a financial interest. In such a case, the provider cannot bill Medicare, Medicaid, the patient or any other third party payer for services. Again, the law is complex and certain exceptions exist. Many states have similar laws.

**Question:** When Dr. Brown sees patients in our cardiac clinic, she refers them to Brown’s Holter Monitor Center for holter monitors. Dr. Brown and her husband own this company. Is this a conflict?

**Answer:** Yes. Federal law prohibits a physician from referring Medicare and Medicaid patients to a health service in which the physician and/or an immediate family member has a financial interest.

Use the Catholic Health Initiatives reporting process whenever you have questions regarding Stark or Anti-Kickback law.

**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 and certain exclusive dealing arrangements.
- Agreeing with competitors to fix wages or divide markets.
- Bribery, deception, intimidation and other unfair trade practices.

**Question:** 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?

**Answer:** 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’ local and national policies; complies with federal and state laws and regulations; and is completed on a timely basis.
- Bill only for services provided and documented in the medical record, using accurate billing codes.
- Immediately notify a manager or the local or 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’ local and national record retention policies.

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

**Answer:** No. Do not submit a bill until appropriate documentation is in the medical record. This verifies the services provided to the patient.

**Question:** Medicare notified us of inaccuracies in our billing. The specific issue has been resolved. However, we have not changed our billing practices. What is my responsibility?

**Answer:** All of us are responsible for the work we do. Speak with your manager to be sure you understand the situation. Feel free to use the Catholic Health Initiatives reporting process to report your concern.

**Question:** Can we perform services for patients who are not registered in our patient registration system?

**Answer:** No. All services must be documented in medical records and appropriately billed, so all patients must be registered.
In fulfilling our duties, we see a wide range of confidential information. 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 maintain and protect the confidentiality of patient, resident, employee and organizational information.

PATIENT AND RESIDENT INFORMATION. Individuals in our care expect us to maintain the confidentiality 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 or resident-specific information with others unless it is necessary to provide care or is required by law or written authorization. Catholic Health Initiatives employees, affiliated physicians and health care partners are permitted to use or disclose protected health information (PHI) only to serve patients and residents. Report improper use, access to or disclosure of confidential PHI by using the Catholic Health Initiatives reporting process.

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

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

**Question:** As an employee of a Catholic Health Initiatives facility, can I look at my own medical information?

**Answer:** No, unless you request access following the same procedures required of any patient. Being an employee does not give you greater access rights.

**Question:** 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?

**Answer:** 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.

**Question:** 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?

**Answer:** 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.

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. 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 or software; information or product if it violates a third party’s interests.

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.
**Question:** 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?

**Answer:** 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.

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

**Answer:** No. Unlicensed software is forbidden on any Catholic Health Initiatives computer. Copying licensed software without written permission is illegal and may result in financial penalties. Unlicensed software on a Catholic Health Initiatives-owned computer 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.

**Question:** 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?

**Answer:** No. Do not disclose confidential information learned through another job. We may not use this type of information in any business dealings. In turn, it would be unethical to share confidential information learned during your employment with Catholic Health Initiatives with a future employer.
Conflicts of Interest

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.

**Question:** 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?

**Answer:** 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. In addition, do not request or accept personal gifts of cash or cash equivalents from any business source. Generally, you may accept non-cash gifts of nominal value from a business source; however, use good judgment. Use the policies of Catholic Health Initiatives and its organizations to determine whether a gift is appropriate.

**Question:** Why can’t I accept some gifts from business sources?

**Answer:** While gifts from business sources are commonly accepted in some industries, health care is different. Because federal government programs pay for health care services with taxpayer dollars, federal laws regulate financial relationships between health care providers and business sources.
**Question:** What type of gifts may I accept from a business source?

**Answer:** 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.

**Question:** What types of gifts should I refuse?

**Answer:** Do not accept cash or cash equivalents. In addition, do not accept any noncash 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 a patient, resident or a member of their family for gifts.

**Question:** Can a business source sponsor a meeting that is not related to its products or services?

**Answer:** 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, neither that individual nor the business source may make the sponsorship a condition of starting or continuing a business relationship.

**Question:** Can I ask a vendor, supplier or other business associate to donate to a department celebration?

**Answer:** 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.”

**Question:** May I accept a gift from a patient, resident or a member of their family?

**Answer:** 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 a member of their family should be shared with your co-workers. Never accept cash or cash equivalents from a patient, resident or a member of their family.
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 managers. 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.

Do not provide testimonial statements or endorsements for use in a vendor 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.

**Question:** I do consulting work for a non-competing company. When I am not busy at work, I type my consulting reports on the hospital’s computer. Is this okay?

**Answer:** 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.

**Question:** I sometimes need to conduct personal business on work time. Is this okay?

**Answer:** 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.

**Question:** I sell cosmetics and candles to earn extra money. Can I advertise my business on the bulletin board in my department or in my hospital’s cafeteria?

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

**Answer:** Yes, with some reasonable limitations. Catholic Health Initiatives and its organizations limit such activities on their premises because they can interfere with operations. However, in general you may solicit and/or distribute non-work related items to other employees if you do it during non-working time (such as break or meal time) and in a non-work area (such as a break or meal room). Consult your organization’s policies and procedures for specific guidelines.

**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 organization, 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.

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

**Answer:** 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 you should resign.
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
  - Catholic Health Initiatives legal counsel

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 pressured to talk with a government agent without first contacting one of the people listed above. 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, magnetic tape, 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.
**Question:** 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?

**Answer:** You were right not to give any information over 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, your manager, the national corporate responsibility officer or Catholic Health Initiatives legal counsel for instructions on how to proceed.

**Question:** 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?

**Answer:** When someone says he or she is a government agent, always ask for identification before providing information. 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 or Catholic Health Initiatives legal counsel for instructions on how to proceed.

**Question:** 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?

**Answer:** No. Do not provide courtesies to any government employee. You or your manager must immediately report this incident by using the Catholic Health Initiatives reporting process. Although you were simply being friendly, the party could be seen as a bribe.
Documentation Standards

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. Make corrections to documents and records according to the guidelines 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.

BUSINESS AND FINANCIAL RECORDS. Financial and accounting records (including cost and research reports, time sheets, mileage reimbursement and expense reports and other documents) must be accurate. Sign and date business and financial documents as appropriate. Fraudulent accounting, documentation or financial reporting is illegal, and inaccurate or improper accounting, documentation or 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.

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

Answer: 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 health care program. We are obligated to follow our own policies and procedures, bylaws and all applicable federal and state laws regulating documentation.
Emergency Medical Treatment and Active Labor Act (EMTALA)

We follow the Emergency Medical Treatment and Active Labor Act (EMTALA), sometimes called the Anti-dumping Statute. EMTALA requires an emergency medical screening examination and necessary stabilization for any patient entering an emergency department or other department in a potentially emergent situation. Catholic Health Initiatives’ facilities may not delay medical screening or stabilization to obtain financial or demographic information from the patient. Catholic Health Initiatives’ facilities may transfer a patient to another facility if the patient or treating physician requests; or if the Catholic Health Initiatives facility does not have the ability to treat the emergency and appropriate care is available at another facility.

**Question:** If we register an emergency room patient before we perform a medical screening examination and stabilization procedures, are we in violation of EMTALA?

**Answer:** You may register the patient first only if the process does not: (1) delay the medical screening examination and stabilization or (2) include questions about the patient’s ability to pay. It is okay to ask the patient if he/she has insurance and the name of the carrier. Any further questions about financial information must wait until after the medical screening examination. 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 on our reverence for the environment. We should, whenever possible, conserve our natural resources; recycle; reduce waste and pollution; eliminate toxins; and use environmentally preferable purchasing. Observance of environmental laws and regulations is one step in demonstrating our commitment.
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.

**Question:** What resources can help me address issues of clinical, organizational and social ethics?

**Answer:** 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.

**Question:** Do we have a standard way of making ethical, values-based decisions?

**Answer:** 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. This process is available from your senior leadership.

Excluded Providers

We do not knowingly employ, conduct business or contract with excluded providers (people or organizations that are excluded by the government from participating in a federally funded health care program). Catholic Health Initiatives and its organizations conduct pre-employment, pre-contracting, pre-credentialing and annual excluded provider status checks. 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 an excluded provider will be appropriately removed from cost report(s).
Marketing Practices

We assure that Catholic Health Initiatives and its organizations are reliable, responsible sources of information about health care. Marketing, communications, fundraising and advertising can educate the community about health issues; increase awareness of services; and facilitate employee recruitment. Catholic Health Initiatives and its organizations:

- Present truthful information in marketing, communications and advertising materials.
- Distinguish opinion from fact when presenting issues.
- Take care not to exploit the fears of patients and residents or their families in marketing, communications, fundraising and advertising activities.

**Question:** Two oncologists just joined the medical staff. We would like to send an announcement to the community to highlight this new service. Is this a permitted marketing practice?

**Answer:** Yes, this is generally acceptable. However, the announcement must highlight the services provided by the organization, not the services provided by the individual physicians in their private practices.

Non-Retaliation

We 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. No retaliatory action will be taken against an individual who makes a good faith report, complaint or inquiry. However, anti-retaliation policies do not protect us if our 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 patients’ fundamental rights.

**Question:** To whom should I report quality of care issues?

**Answer:** Such issues encompass numerous 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 your quality of care issue is not being adequately addressed, use the Catholic Health Initiatives reporting process.

**Question:** If I see that a patient is not being treated with proper courtesy and respect, what should I do?

**Answer:** 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.
The tax-exempt status of Catholic Health Initiatives and most of its organizations carries certain restrictions on political activities. There are limits on our legislative activities and we cannot participate in political campaigns. Participation in political campaigns or 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.

**Permissible actions for a tax-exempt organization include:**

- 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 actions for employees of a tax-exempt organization include:**

- 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.

**Prohibited actions for a tax-exempt organization include:**

- Supporting or opposing a candidate for public office.
- Sponsoring a fund raiser or other event to support a candidate for public office.
- Contributing organizational funds or time to a candidate, a PAC or a political party.
- Asking people within the organization to support or oppose a candidate or contribute to a campaign or PAC.
- Using organizational resources to seek support for or opposition to a candidate or a contribution to a PAC.

**Prohibited actions for employees of a tax-exempt organization include:**

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

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

**Answer:** 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 Ethics at Work and the policies and procedures of Catholic Health Initiatives and its organizations. We keep accurate and reliable financial records and reports.
- Speak or provide educational training at internal and external work-related functions. If you receive payment for external activities performed during work time, forward the payments to the organization’s foundation or other designated department.
- We ensure that our assets are used only for our health care mission, not for our personal business or benefit. We do not use organizational equipment, supplies, materials or services for unauthorized purposes. We use the Catholic Health Initiatives reporting process if we have questions about the proper use of organizational assets.
- We use good judgment when using our assets for business travel and entertainment.

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. To keep our tax-exempt status, we use our resources to further the religious and charitable purposes of our mission. Tax laws forbid:

- 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 researcher’s use of our time, equipment or facilities.
- 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 forbidden.
- Permitting any person to buy, sell, lease or use organizational property at less than fair market value.
- Engaging in forbidden political activity or substantial lobbying.

Work Community of Choice

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 contributions and celebrating success.
- Supporting a healthy balance of work and personal life.
- Complying with laws that regulate employment and protect the 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 into the future.

CREDENTIALED PROVIDER QUALIFICATIONS. We retain appropriately licensed and credentialed individuals to provide patient care. Each individual is responsible for performing 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. Exit interviews help identify and resolve workplace problems and increase employee retention. Exit interviews can help build the organization’s strengths; shape and improve policies; and troubleshoot problems in the workplace. No retaliatory action will be taken against employees who report situations they believe are contrary to our standards during exit interviews.
Getting Help

When you are unsure about the right thing to do or are confused about a particular action, this section of *Ethics at Work* provides guidance.

REPORTING CONCERNS. As an organization and as individuals, we are responsible for promptly reporting potential violations of law, regulation, policy, procedure or *Ethics at Work*. We can use the reporting mechanisms in place, including discussing the matter with a manager or with human resources, risk management, security or quality personnel. In addition, we can use the Catholic Health Initiatives reporting process described below.

If you need help:

- Speak with your supervisor or another manager.
- If the manager is not available, or you are not comfortable speaking with him or her, or you believe the matter has not been adequately resolved, contact your human resource representative or your local corporate responsibility officer.
- If you want to report a concern anonymously, call the Catholic Health Initiatives Alertline. The Alertline is a confidential service available 24 hours a day, seven days a week. **The Alertline number is 1-800/261-3607.** Calls are received by trained staff who document and forward information to your local corporate responsibility officer for appropriate action. Calls to the Alertline are not traced or recorded. Callers can remain anonymous. If callers choose to identify themselves, there is no guarantee their identities will remain confidential. However, when a caller identifies himself or herself, it may be easier for the corporate responsibility officer to provide a direct response.
NO RETALIATION POLICY. No retaliatory action will be taken against an individual for making a report, complaint or inquiry in good faith. However, anti-retaliation policies do not protect us if our actions violate the policies of Catholic Health Initiatives or its organizations or applicable laws.

TRAINING AND EDUCATION. Comprehensive training and education is available to help ensure understanding and compliance with organizational expectations for ethical business conduct. This education and training is provided to employees when they join the organization. In addition, many employees receive specialized training on subjects such as billing, coding, safety, environmental issues and regulations that relate specifically to their jobs.

CONSEQUENCES OF FAILURE TO COMPLY WITH ETHICS AT WORK. As a minimum standard, each person 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 Ethics at Work. 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 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, 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.
Reference Guide

Contact your local corporate responsibility officer or other personnel when you have questions regarding *Ethics at Work* 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 education and training
- Corporate responsibility program orientation
- EMTALA
- Stark
- Anti-kickback
- Antitrust compliance
- Billing issues
- Improper or incorrect documentation for billing
- Non-compliance with *Ethics at Work* 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 or residents
- Medically unnecessary services provided to patients or residents
- Other activities that violate federal, state or local law, statute, regulation, 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 and disputes
- Americans with Disabilities Act issues
- Illegal drug use
- Labor relations and union issues
- Worker’s Compensation issues
- Weapons and violence in the workplace
- Gambling in the workplace
- Unexcused absences or repeated tardiness
- Compensation (unless related to a contract)
- Employee benefits

### Types of Issues Addressed by Ethics Resource Persons/Social Workers/Nursing/Pastoral Care

- Advance directives
- Disrespect of patients or residents
- End-of-life issues
- Patient rights
- Patient grievances
- Clinical issues
Acknowledgment and Certification

I acknowledge that I have received a copy of the Catholic Health Initiatives *Ethics at Work* booklet and I agree to read it completely. I also agree to discuss any questions or concerns regarding *Ethics at Work* with my supervisor, team leader or other manager.

I certify that I will comply with *Ethics at Work* standards and guidelines and any other standards or policies set by my organization 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 my local organization will retaliate against me for making a good-faith report.

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 *Ethics at Work* 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 any updates that occur.

Name (Please Print): ____________________________________________________________

Department: ________________________________________________________________

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.
Conclusion

Our core values and standards of conduct are guiding principles that help us promote *Ethics at Work*. It is our responsibility to understand and follow these standards. Contact your manager, the local or national corporate responsibility officer or the Alertline with questions or concerns. No retaliatory action will be taken against anyone who makes a good faith report of a potential violation of *Ethics at Work*.

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

Contact Information

Local Corporate Responsibility Office

[insert STICKER with local contact information]

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

Catholic Health Initiatives Alertline
1-800/261-5607