



OUR VALUES AND ETHICS AT WORK

Reference Guide



**Catholic Health
Initiatives**

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

Our Values and Ethics at Work



WHERE WE 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 serving many different groups of patients, residents, members of managed care and insurance

plans (hereinafter referred to as members) and other individuals. Many of the laws and regulations that govern health care are difficult to understand and to apply consistently. Catholic Health Initiatives has created this reference guide to help you understand these laws and regulations. This reference guide also describes our standards of conduct and how to apply them to your daily work situations.



“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, 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, Senior Vice President and
Corporate Responsibility Officer
Catholic Health Initiatives

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, members and others we serve. 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 reference guide 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
Chief Executive Officer

Michelle Cooper
Senior Vice President and
Corporate Responsibility Officer

CATHOLIC HEALTH INITIATIVES FRAMEWORK

Where We Want to Be

Our Vision is to live up to our name as one Catholic Health Initiatives:

Catholic: Living our Mission and Core Values.

Health: Improving the health of the people and communities we serve.

Initiatives: Pioneering models and systems of care to enhance care delivery.

Why We Exist

Mission: The mission of Catholic Health Initiatives is to nurture the healing ministry of the Church, supported by education and research. Fidelity to the Gospel urges us to emphasize human dignity and social justice as we create healthier communities.

How We Will Measure Our Progress

Balanced Scorecards, Dashboards, Cultural Attributes, Surveys and Evaluations





What Are Our Guiding Principles?

Nearly 700 employees, physicians, participating congregation members and board members from throughout Catholic Health Initiatives participated in the process of naming our core values. The core values define Catholic Health Initiatives and serve as our guiding principles. They are the roots, or anchors, from which all of our activities, decisions and behaviors follow.

Reverence

Profound respect and awe for all of creation, the foundation that shapes spirituality, our relationships with others and our journey to God.

Integrity

Moral wholeness, soundness, fidelity, trust, truthfulness in all we do.

Compassion

Solidarity with one another, capacity to enter into another's joy and sorrow.

Excellence

Preeminent performance, becoming the benchmark, putting forth our personal and professional best.

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



Introduction to the Corporate Responsibility Program

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 its organizations provides 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:



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

2010 Federal Sentencing Guidelines Manual

- 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 48. 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, regional and national corporate responsibility officers.
- Federal and state laws and regulations.
- Consultation from Catholic Health Initiatives Legal Services Group attorneys.

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.

STANDARDS OF CONDUCT

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.

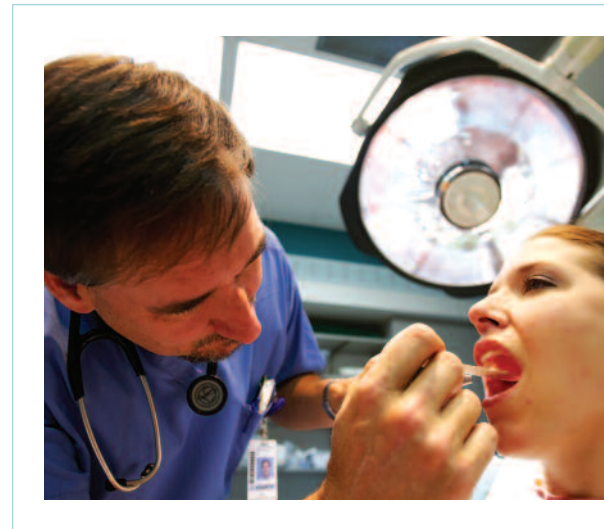


6. Avoid conflicts of interest and/or the appearance of conflicts.



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 information with people not directly involved in the patient'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 Statute and Physician Self-Referral Law (Stark Law)

Anti-Kickback Statute

The federal anti-kickback statute prohibits individuals and entities from knowingly offering, paying, soliciting or receiving “remuneration” (or “kickbacks”) to induce or reward referrals of items or services paid for by federally funded programs. Medicare and Medicaid are examples of federally funded programs covered by the federal anti-kickback statute.


In short, we may not directly or indirectly pay patients, physicians or other health care providers to refer patients to us. The federal anti-kickback statute is complex and has limited exceptions. Many states have laws similar to the federal anti-kickback statute. Avoid any conduct that violates, or appears to violate, the federal or state anti-kickback statutes. If you are in doubt about whether a particular situation may involve the anti-kickback statute, you should contact your corporate responsibility officer or Catholic Health Initiatives Legal Services Group attorney for guidance before proceeding.

The anti-kickback statute is intended to prevent: (1) medical judgment and treatment decisions being compromised because of an expectation of kickbacks; (2) the overutilization of items or services covered by federal health programs; (3) increased costs to the Medicare/Medicaid programs because unnecessary or excessive care has been provided; and (4) unfair competition (see also the section on Antitrust).

 **Q** What are “kickbacks?”


A Kickbacks are gifts, gratuities, incentives or anything of monetary value given with the expectation or understanding that an individual will make referrals to us or be rewarded for past referrals. In addition to cash and cash equivalents (for example, gift certificates or gift cards), examples of prohibited kickbacks include:

- Gifts and other financial incentives given with an expectation of future referrals or as a reward for past referrals.
- Free supplies, space, personnel or equipment.
- Free trips, lodging and food (in excess of what is allowed by Catholic Health Initiatives policies).
- Excessive discounts (other than those defined in the charity care or other discount policies of Catholic Health Initiatives).
- Written-off accounts receivable (other than those defined by policy).

 **Q** What types of incentives are inappropriate to offer to physicians and may be considered a kickback if intended to induce or reward referrals?

A 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.

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


A No. We 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.

Physician Self-Referral Law (Stark Law)

The Stark 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 to the provider with whom he/she has a financial relationship and (2) the provider cannot bill for services provided to those patients. The Stark Law is complex and numerous exceptions exist. Many states have laws similar to the Stark Law.

Unlike the federal anti-kickback statute just reviewed, which requires that one of the parties intends to reward or induce health care referrals, the Stark Law is a "strict liability" statute. This means that even unintentional violations of the Stark Law may have significant consequences to the individuals involved and their organizations. If you have any questions about whether a particular situation may involve the Stark Law, you should contact your corporate responsibility officer or Catholic Health Initiatives Legal Services Group attorney for guidance before proceeding.

 **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, if the physician refers any Medicare patients to the hospital for services, the medical directorship must be structured to meet a Stark Law exception.

 **Q** Who qualifies as an “immediate family member” under the Stark Law?



A The term “immediate family member” is defined broadly to mean a husband or wife; birth or adoptive parent, child or sibling; stepparent, stepchild, stepbrother or stepsister; father-in-law, mother-in-law, son-in-law, daughter-in-law, brother-in-law or sister-in-law; grandparent or grandchild; and spouse of a grandparent or grandchild.

Use the Catholic Health Initiatives reporting process, detailed on page 48, whenever you have a question about the Stark Law or Anti-Kickback Statute.

Antitrust Compliance

We comply with laws that regulate competition in health care and avoid activities that are anti-competitive. Examples of actions that may be illegal under the antitrust laws include:

- Agreeing with competitors to fix prices.
- Joining with competing providers to negotiate contracts with payers.
- Sharing price-sensitive information with competitors.
- Participating in boycotts with competitors.
- Participating in arrangements that are designed to exclude competitors.
- Agreeing with competitors to fix wages.
- Agreeing with competitors to divide geographic or product markets.
- Bid-rigging and other unfair trade practices.



  **Q** 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?

A No. Sharing salary information may appear to be an effort to fix wages and limit competition in the marketplace.



Coding and Billing (Also see Documentation Standards)

Federal and state laws control third-party billing for patients, residents, members 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, 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 Catholic Health Initiatives 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 that 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.

Confidential Information

In fulfilling our duties, we see a wide range of confidential information. We treat information about our patients, residents, members and others we serve as confidential and proprietary information. This means that Catholic Health Initiatives does not share this information with the public and is careful to share it with business partners only when they have a need to know the information. Confidential and proprietary information is maintained in different forms such as paper records, electronic records, films 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 individuals we serve, employees and organizational information.

Refer to your organization's Privacy, Security and Confidentiality policies as well as the Catholic Health Initiatives Information Security Policies for more information. Feel free to use the Catholic Health Initiatives reporting process, detailed on page 48, if you have any questions or wish to report any concern.

-  **Q** We just hired a new employee in our department. The day she started we were still waiting for her computer login information 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?
- A** You are not permitted to share your username and password with another person. Please inform this new employee that sharing your username and password would result in a violation of the Catholic Health Initiatives Information Security Policies. Ask your supervisor to contact the Information Technology Services (ITS) Help Desk to submit or check on the status of the appropriate access request.
-  **Q** My department is understaffed and in order not to fall behind in my assignments, I sometimes take work home. May I copy confidential data on a portable storage device or laptop computer for this purpose?
- A** This would be appropriate only if a Catholic Health Initiatives device, such as a laptop, is used and manager approval has been obtained. You should never copy confidential information to a non-Catholic Health Initiatives device or send confidential



information to an external, unsecured email address. Confidential information must only be stored on company-approved devices.

Q I 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 when 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 periodically change your password provides you with additional protection. It makes it more difficult for unauthorized users to get access to your information.

Q I am excited about the work I do at Catholic Health Initiatives and would like to post information on Facebook to share my day with my friends. Is it okay to do this?

A Using social media, such as Facebook, LinkedIn, Twitter and other sites, to post information about your work

should be done carefully and during non-working time. Posting information about your day should be limited to comments in general terms and not include references to or comments about confidential information. Posting of any confidential information, such as patient names, photographs, videos or business information, is against Catholic Health Initiatives privacy and security policies. If you have any questions regarding social networking, contact your local corporate responsibility officer.

The following guidelines will help you create or change a password. To enhance security, a strong password should be constructed.

Your password should contain:

- At least eight (8) characters and at least three (3) of the following:
 - One (1) uppercase letter

- One (1) lowercase letter
- One (1) number
- One (1) special character

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 strong passwords that are complex, yet easy to create and remember.



- lh2ca1d (I have 2 cats and 1 dog)
- UKimn1t2 (UK is my number 1 team too)

Confidential Information — continued


Information about Patients, Residents, Members or Others We Serve

Individuals we serve expect us to maintain the confidentiality and security of their health information. At Catholic Health Initiatives we not only follow the Church's teachings and apply its moral principles, but we also follow national and state privacy and confidentiality laws such as the Health Insurance Portability and Accountability Act of 1996 (HIPAA). Breaking these laws may result in civil or criminal penalties for Catholic Health Initiatives and/or the responsible individuals. The Ethical and Religious Directives as described on page 32 speak to the importance of confidentiality. Ethical and Religious Directive number 34 states "Health care providers are to respect each person's privacy and confidentiality regarding information related to the person's diagnosis, treatment, and care."

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 and care for our patients, residents, members and others in our care. We do not use, disclose or discuss confidential information with others unless the patient, resident, member or other individual in our care authorizes the release of his/her information or we are required or authorized by law to release the information. Catholic Health Initiatives and the individuals who improperly use or disclose confidential information may face civil and/or criminal penalties for breaking these laws. In addition, employees may face disciplinary action up to and including termination. If you think that PHI is being improperly used, accessed or disclosed, report your concern by using the Catholic Health Initiatives reporting process detailed on page 48.

-  **Q** In the break room, I heard my co-worker discussing the condition of a physician's spouse who is receiving treatments at our hospital. What should I do?
- A** Physicians and their families are entitled to have their health information kept confidential in the same manner as other patients. The situation you describe is against the confidentiality policies of Catholic Health Initiatives. Discuss the issue with your manager or local privacy officer. You may also 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** You are entitled to have access to your medical record in the same manner as any individual in our care. However, you must follow the same procedures required of any individual in our care requesting access to his/her health information. Being


an employee of a health care entity does not give you greater access rights. You are still required to follow the proper procedure to request access to your health records.

 **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 of a health care entity does not give you greater access rights. You are still required to follow the proper procedure that any family member would have to follow in order to look at a family member's health information. The patient must give written authorization for you to review the patient's medical record.

Employee Information

We keep employee information confidential by following human resources policies and state and federal laws. Employee personal information includes wage and salary information, employment agreements, employment history and status, Social Security numbers, and financial and banking information.



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

A No. You must keep employee information 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 48.

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. Proprietary information is used only for legitimate business purposes and protections are in place to prevent unauthorized use or disclosure. If your employment or association with Catholic Health Initiatives ends, you have an ongoing obligation to maintain the confidentiality of this information.

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 confidential information about the competitor that would help the hospital negotiate contracts. Should I share this information?

A No. Do not disclose confidential information learned through another job. It is inappropriate to use a competitor's confidential information and we may not use this information in any business dealings. It would also be unethical for you to share Catholic Health Initiatives' confidential information with another employer.



Conflicts of Interest

Conflicts of interests 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 writing, in advance and approved according to the policies of Catholic Health Initiatives. 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. Avoid inappropriate personal ties to or bias toward 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. In addition, do not request or accept personal gifts of cash or cash equivalents from any business source. Refer to Catholic Health Initiatives Corporate Responsibility Policy No. 1: *Gifts and Payments From Business Sources: Employee Arrangements with Business Sources* and other relevant policies 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, 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.



  **Q** What types 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. 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 also 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 a modest 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. 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 Possibly. There may be situations in which a meeting organizer or representative of your organization may ask a business source to contribute some of the cost of a local 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. Before accepting any sponsor funds, refer to Catholic Health Initiatives Corporate Responsibility Policy No. 1: *Gifts and Payments From Business Sources: Employee Arrangements with Business Sources*.

Conflicts of Interest — continued

  **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 should be shared with your co-workers. Never accept cash or cash equivalents from patients, residents or members of their families. However, donations may be made to the foundation or fund-raising department of your organization.


Outside Interests and Activities

If you own or have any type of employment or consulting relationship with an outside organization from which Catholic Health Initiatives buys goods or services, the relationship 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-competing 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. 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. 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 is a charitable, tax-exempt organization. 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.


Conflicts of Interest — continued

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.
- Do not vote on matters that might affect the interests of Catholic Health Initiatives.
- When speaking as a board member, do not identify yourself as speaking on behalf of Catholic Health Initiatives 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 retains 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. Disclose and 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

In most instances, copyrighted, trademarked or licensed materials may not be copied or used without written permission. Certain exceptions may apply such as the Fair Use Doctrine for copyrighted materials. The Fair Use Doctrine allows limited use of copyrighted material without getting permission from the copyright holder. Examples of fair use include commentary, criticism, news reporting, research and teaching. As a general rule, if you are unsure whether something is protected by copyright, trademark or a license or whether it may be copied or used, check with your supervisor to determine the status.

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

A First you should determine whether the materials are copyrighted, which is usually marked on the materials in some manner. If you are not sure, you should check with your supervisor. If the materials are copyrighted, do not copy them without written permission from the copyright holder. You may summarize the information for your co-workers or let them use the original materials. Your supervisor may also check with the Catholic Health Initiatives Legal Services Group to determine if an exception applies such as the Fair Use Doctrine.

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

A No. Only software approved and licensed by Catholic Health Initiatives should be installed on a computer owned by Catholic Health Initiatives. Personal software should not be installed on a computer owned by Catholic Health Initiatives. If installed, it must be removed immediately. If an employee refuses to remove personal software, report the situation using the Catholic Health Initiatives reporting process, detailed on page 48.



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.
 - The Catholic Health Initiatives corporate responsibility officer, 1-303-383-2730.
 - Catholic Health Initiatives' Legal Services Group attorney.
 - 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. If you are feeling frightened or pressured, or are unsure about speaking with a government agent, you should contact one of the people listed to the left before proceeding. 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, including paper, electronic or computer records.
- Lie or provide false, misleading or incomplete information.
- Persuade any employee or other person to provide false, misleading or incomplete information.
- Persuade any employee or other person to not cooperate with government investigators.
- Offer any item of value to a government official, as it may be interpreted as a bribe.

Refer to the policies of Catholic Health Initiatives 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 Catholic Health Initiatives corporate responsibility officer and Legal Services Group attorney 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 Catholic Health Initiatives corporate responsibility officer or Legal Services Group attorney for instructions on how to proceed.



Q An Internal Revenue Service agent conducted an investigation in our entity 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.



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.

Corrections to documents and records must be made according to the guidelines and policies of Catholic Health Initiatives, 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.





Financial and Business Records

Financial and business records (including cost and research reports, time sheets, mileage reimbursement reports, expense reports and other documents) must be accurate. Sign and date financial and business documents as appropriate. Fraudulent accounting and financial reporting is illegal, as well as any fraudulent documentation.

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 health care 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 Labor Act


Catholic Health Initiatives requires its applicable entities to comply with the Emergency Medical Treatment and Labor Act (EMTALA), sometimes called the “Anti-Dumping Law.” Numerous states have also enacted similar laws, some of which are more stringent than the federal law. These laws must be followed by all Catholic Health Initiatives organizations. The federal law requires hospitals with a dedicated emergency department to provide a medical screening examination to any individual who comes to the emergency department and requests services for a medical condition. In addition, necessary stabilization must be provided within the capability of the staff and the health care entity 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 examinations 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 health care entity if: (1) the patient requests the transfer and has been informed of the hospital’s obligations and the risks and benefits of transfer; or (2) a physician certifies that the medical benefits provided at another entity 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 48, if you have any questions or wish to report any concern.



 **Q** Does the EMTALA law permit us to register an individual who comes into our emergency department before we perform a medical screening examination and stabilization procedures?

A You may follow reasonable registration procedures to register an individual first only if the process does not: (1) delay the medical screening examination and any necessary stabilizing treatment; or (2) include questions about the individual's method of payment or ability to pay. You may ask the individual 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 individual from remaining in the emergency department for further evaluation. Catholic Health Initiatives organizations shall not request prior authorization from the individual's insurance company or managed care plan before completing a medical screening examination or beginning stabilizing treatment. Any further questions about financial information must wait until after the medical screening examination and any necessary stabilizing treatment have occurred. Only employees trained in EMTALA regulations and hospital procedures should register the patient.

 **Q** When an individual presents to the emergency department or other department at a hospital with a condition that is clearly not an emergency, does the EMTALA law permit us to refer the individual to a physician's office without performing a medical screening examination?

A No. If an individual comes to a hospital's dedicated emergency department and a request is made on his or her behalf for examination or treatment for a medical condition, a medical screening examination is required. However, if the nature of the request makes it clear that the medical condition is not of an emergency nature, the hospital is required only to perform such screening as would be appropriate for any individual presenting in that manner to determine that the individual does not have an emergency medical condition. Once the individual has been screened and it is determined the individual has only presented to the dedicated emergency department for a non-emergency purpose, the hospital's EMTALA obligation ends for that individual at the completion of the medical screening examination. The individual may then be given discharge instructions to follow up with a community physician.

Environmental Responsibility



We are committed to being good stewards of the environment and finding long-term solutions that maintain the health of our planet. We recognize that our well-being, and the well-being of future generations, depends upon our reverence for the environment. We should conserve our natural resources, recycle, reduce waste and pollution, promote energy-efficient technologies, eliminate toxins, encourage healthy and sustainable food sources and use environmentally preferable purchasing. We comply with environmental laws and regulations related to health care and work to expand our efforts beyond such requirements.

Ethical and Religious Directives

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.”

The directives were revised in 1994 to respond to new developments in medical science and technology. There was an additional revision in 2009 resulting in the 5th edition of the *Ethical and Religious Directives for Catholic Health Care Services*. 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 conducts pre-employment, pre-contracting, pre-credentialing and ongoing excluded provider status checks on individuals, providers and entities associated with us. Excluded providers are not eligible to be employed by or to contract with Catholic Health Initiatives. Any relationship with an employee, individual or entity 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 is 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) their 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 § 3729-3733) 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, (4) making or using a false record to avoid payments owed to the government, or (5) concealing or improperly avoiding an obligation to pay the 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.
- Failing to repay the federal government for an identified overpayment.

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 website at www.catholichealthinitiatives.org

for detailed information regarding your state's False Claims Act. Once you have accessed the website, type "state summaries" using the search feature to access the direct link.

Rights of Employees, Contractors and Agents to be Protected as Whistleblowers Under the False Claims Act

The federal False Claims Act 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, if they, in good faith, file or are involved in a false claims act case or they take action to stop a violation of the federal False Claims Act or a state false claims act. An

employee, contractor or agent 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 federal or state false claims acts.

Marketing Practices

Catholic Health Initiatives provides 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.

Any advertising or marketing conducted by Catholic Health Initiatives must:

- Present truthful, accurate and non-deceptive information to the public in all marketing, communications and advertising materials.
- Distinguish opinion from fact when presenting issues.
- Not exploit the fears of patients, residents, members or others we serve or their families in our marketing, communications, fund raising and advertising activities.
- Comply with applicable federal and state laws for marketing and advertising activities, including any marketing and advertising activities provided for non-employed physicians or physician groups.
- Obtain the consent of the person or third party whose name or likeness will be used prior to public dissemination of the advertising or marketing material.



Q 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?

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

Non-Retaliation/Non-Intimidation

Catholic Health Initiatives promotes an environment that encourages all of us to seek clarification of issues and report questions and concerns involving our organization. It is our duty and responsibility to report possible violations of our standards, guidelines or policies. You will be protected from retaliation and intimidation if you make a good-faith report, complaint or inquiry. A person who retaliates against or intimidates 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. Non-retaliation policies do not protect you if your actions violate the policies of Catholic Health Initiatives or applicable laws.


Patient Care and Rights

We deliver quality care without regard to race, color, religion, gender, sexual orientation, 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 48.

 **Q** If I see that a patient, resident, member or other individual in our care 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. In order to assist the family in making any additional and well-informed care decisions, the disclosure must take place in a coordinated manner. Contact your manager and your quality or risk manager to ensure the disclosure is handled within your organization's prescribed process.

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

A Work with your team to make sure all printed/educational documentation is (1) provided in an easy-to-understand format, and (2) use teach-back methods to ensure they actually understand. If you think a patient or family is being pressured to make a particular decision, talk with your manager, your local patient advocate, quality or risk manager, or use the Catholic Health Initiatives reporting process detailed on page 48.



Political Activities

The tax-exempt status of Catholic Health Initiatives and most of its organizations carries certain restrictions on political activities. We may, and are encouraged to, engage in public policy advocacy efforts, particularly on behalf of persons who are poor or underserved. However, there are restrictions on corporate political activity due to our tax-exempt status.

Participation by tax exempt organizations in political campaigns is not permitted. “Substantial” lobbying activity at the local, state or federal levels is not permitted. There is no precise definition of “substantial,” but a general rule of thumb is committing more than

5% of an organization’s total expenditures toward lobbying. The Internal Revenue Service watches and investigates the political activities of tax-exempt organizations. Violation of the rules could jeopardize our tax-exempt status.

The following guidelines provide an overview of what is and is not allowed.

Permissible Activities for a Tax-Exempt Organization

- Encouraging individuals to call and/or write a letter to elected officials to express the organization’s view on a public policy issue or legislation.
- Arranging personal visits with

elected officials, legislators and government agencies to provide the organization’s perspective on public policy issues or legislation.

- Holding public forums, lectures and debates to raise awareness of public policy issues and to inform voters of their impact on the organization.
- Calling attention to the moral aspects of public policy and legislation, including during an election year.
- Providing financial and in-kind support to groups sponsoring ballot initiatives, referenda and similar measures.
- Hosting candidate forums, debates and visits as long as all candidates for office are given an equal opportunity to appear and speak to employees.
- Allowing a candidate to appear at an organization if the appearance is based on the candidate’s status as an expert, public figure or celebrity, and no mention is made of the candidacy, and there is no campaign or election-related activity.
- Distributing information

prepared by the tax-exempt organization about candidates' views (e.g., candidate surveys) as long as the materials do not express or imply support for, or opposition to, a candidate.

- Using a tax-exempt organization's resources, facilities and personnel to sponsor non-partisan voter registration drives.

Permissible Activities for Employees of a Tax-Exempt Organization

- Personally endorsing, supporting or opposing a candidate as long as the employees do not imply they are representing Catholic Health Initiatives or use organizational resources (such as telephones, office supplies and email).
- Contributing personal funds to support or oppose a candidate.
- Contributing personal funds to a political action committee (PAC).

Impermissible Activities for a Tax-Exempt Organization

- Supporting or opposing a candidate for public office.
- Contributing organizational funds or resources to a candidate, election campaign committee or PAC.
- Sponsoring a fundraiser or another event that endorses a candidate on or off the property of the organization.
- Inviting a candidate or a select group of candidates to appear at a tax-exempt organization for the purpose of conducting election-related activity or promoting a candidacy.
- Engaging in activities or making statements during a candidate appearance that indicate support for or opposition to a candidate.
- Establishing a PAC on behalf of a tax-exempt organization.
- Using the tax-exempt organization's resources, facilities or personnel to support or solicit support for a PAC.
- Distributing voter education


or any other material prepared by a candidate, political party or PAC.

- Permitting candidate, political party or PAC literature to be placed or distributed on the premises.

Impermissible Activities for Employees of a Tax-Exempt Organization

- Asking or pressuring a fellow employee to endorse, support or oppose a candidate.
- Using the organization's resources, facilities or personnel to solicit support, opposition or contributions for a candidate (mailing lists, letterhead, etc.).

Example:

 **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 a tax-exempt organization, Catholic Health Initiatives may not contribute money or resources to political campaigns.

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.
- 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 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 48, if we have questions about the proper use of organizational assets.





Record Retention

All clinical, financial, employee and other records of Catholic Health Initiatives 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.

Research

Grant Management

Catholic Health Initiatives may receive money in the form of grants for specific purposes, such as to provide telemedicine in rural communities or to conduct specific research studies. The grantor may be a private foundation, or state or federal government agency. Effective grant management requires Catholic Health Initiatives to comply with the grant obligations when accepting funds from private or government agencies. Proper processes must be in place to ensure compliance with all terms and conditions of the award.

Prior to accepting a private or government grant/contract, the organization must develop a clear understanding of the compliance and reporting requirements in order to determine if it has the necessary resources and processes in place to comply with the terms of the award. If the organization does not currently have the resources or processes in place, it must be committed to developing those resources and processes. If it is not willing to make these commitments, it should not pursue the grant or contract. Understanding these requirements prior to accepting an award is also important because this information may be

necessary for the budgeting and negotiating processes. Contact your local corporate responsibility officer if you have any questions related to these requirements.

Medical Research Compliance

Catholic Health Initiatives is committed to high standards of ethics, honesty and integrity when engaging in medical research. Any dishonesty, fraud or research misconduct may damage the reputation and credibility of investigators, the scientific community at large, Catholic Health Initiatives and its organizations. Research staff and health care professionals are responsible for conducting research with scientific integrity and in accordance with Catholic Health Initiatives' core values and the Catholic Church's teachings, especially the *Ethical and Religious Directives for Catholic Health Care Services*. Those involved in medical research must be knowledgeable of all applicable government regulations relating to such research and also the Catholic Health Initiatives policies and procedures relating to research compliance.

Institutional Review Boards and Informed Consent

An Institutional Review Board (IRB) reviews and monitors all research involving human subjects. In accordance with federal regulations including Food and Drug Administration (FDA) and Health and Human Services (HHS) regulations, an IRB has the authority to approve, require modifications in, or disapprove research.

Research informed consent is a process and not just a form. This process allows a prospective research subject to receive information about the research, its risks,

benefits and alternatives. Sufficient information about risks, benefits and alternatives to the research must be provided. The informed consent must also comply with the *Ethical and Religious Directives for Catholic Health Care Services*.

Scientific Integrity

Federal regulations prohibit misconduct in scientific research, which includes intentional fabrication, falsification, or plagiarism in proposing, conducting, or reporting research results. These regulations are designed to prevent dishonesty





and fraud in federally-funded research programs. Staff members and medical staff involved in research must complete education in the protection of human research participants. These individuals are expected to be vigilant in identifying violations of research regulations and report any violations to their local corporate responsibility officer, research compliance officer, or the Catholic Health Initiatives corporate responsibility officer.

Research Billing Compliance



In order to respect Catholic Health Initiatives' values and adhere to applicable government regulations, it is our responsibility to only submit truthful and accurate claims for any service provided by our entities. It is especially important to follow the appropriate guidelines, laws and regulations for patients participating in clinical research. The billing for services under clinical trials includes unique requirements that often involve communication and coordination with several departments to ensure accurate and compliant billing practices as well as timely payment for services. For questions or assistance with research billing, contact your local corporate responsibility officer.





  **Q** A physician approached me about starting a new human subject research project under a pharmaceutical company grant. What should I do?

A All human subject research conducted within Catholic Health Initiatives must be approved by an Institutional Review Board (IRB). Some organizations utilize a local IRB, which requires following local procedures. The Catholic Health Initiatives Institute for Research and Innovation has an IRB that is available to other organizations. Contact your local corporate responsibility officer for assistance with this process.

  **Q** What if I am unsure of how the billing should be handled for a particular research study?

A If you feel that you do not have the proper information to handle research billing, contact your local corporate responsibility officer.

Tax-Exempt Status

Catholic Health Initiatives and most of its organizations are nonprofit, tax-exempt and operated solely for religious and charitable purposes. This status provides Catholic Health Initiatives 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 in supporting healthy communities. Tax laws prohibit our tax-exempt organizations from:

- Providing goods, services, leases, compensation or other benefits to organizational insiders (such as an officer, director, key employee or physician) without receiving equivalent value in return. Some examples include:
 - Paying more than fair market value for services, products or leases provided by an insider.
 - Providing courtesy discounts and other uncompensated benefits to physicians, officers, directors and trustees, other than those provided for by organizational policy.
 - 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 its time, equipment, or facilities in connection with the research.
- Subject to certain exceptions, providing goods, services, leases, compensation or other benefits to a third party (who is not an insider) without receiving equivalent benefit in return. Some examples include:
 - Taking part in a joint venture, partnership or similar transaction that results in an improper private benefit (gain) to a third party.
 - Recruiting physicians or other key employees with incentives or compensation plans that are in excess of fair market value or do not serve an identified community need other than those benefits provided by organizational policy.
 - Leasing a facility to a third party at less than fair market value.
 - Providing services to a third party at less than fair market value, such as billing services to private physicians or providing health care services at less than fair market value, except where permitted by Catholic Health Initiatives' charity, prompt pay or other discount policies.
 - Permitting any person to buy, sell, lease or use organizational property at less than fair market value.
 - Engaging in any political activity (see page 38).

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 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 participate in exit interviews through the human resources process. This process allows individuals the opportunity to raise any concerns about compliance with the standards defined in the *Our Values and Ethics at Work Reference Guide*. Information that you provide in an exit interview helps Catholic Health Initiatives 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.





GETTING HELP

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' Ethics at Work website.

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 Catholic Health Initiatives 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 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 may include risks to the safety of those we serve, 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.

REFERENCES

Contact your local corporate responsibility officer or other personnel when you have questions regarding the *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. 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 statute
- 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
- Potential or actual disclosures of confidential information, including privacy and/or security breaches
- Misuse of assets
- Compensation arrangements related to a contract
- Contractual relationships potentially involving referrals

- of patients or residents
- Medically unnecessary services provided to patients, residents, members or other individuals in our care
- Suspected identity theft
- Other activities that may violate federal, state or local law, statutes, regulations, guidelines, or rules that govern the health care industry
- Inappropriate use of social media

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

- 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
- Uniformed Services Employment and Reemployment Rights Act

Types of Issues Addressed by Ethics Resource Persons/Risk Management/Nursing/Pastoral Care

- Advance Directives
- Disrespect of patients, residents, members or others we serve
- End of life issues
- Patient rights
- Ethical and Religious Directives
- Patient grievances
- Clinical issues/quality of care concerns

ACKNOWLEDGMENT AND CERTIFICATION

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 other appropriate Catholic Health Initiatives leader. I certify that I will comply with the *Reference Guide* standards and guidelines and any other standards or policies set by Catholic Health Initiatives or 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.

I also understand that I may be asked to cooperate in an investigation of matters that may affect or relate to compliance with applicable standards, guidelines or policies and agree to do so when asked. 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 or association and periodically thereafter. I understand that Catholic Health Initiatives reserves the right to terminate my employment or other association if I am an excluded provider.

I understand that the *Reference Guide* contains standards for behavior within Catholic Health Initiatives and is not a contract for employment or other services. I also understand that these standards may be amended, modified or clarified at any time, and that I will receive periodic updates to these standards.

Please Print

Name _____

Department, Board, Board Committee or Other Affiliation _____

Organization _____

Signature _____ Date _____

Please complete the above 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. This may also be submitted electronically. Consult with Human Resources or your local corporate responsibility officer if you have any questions about this process.



“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 the *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 Catholic Health Initiatives 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 standards, guidelines and policies outlined in 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.



Catholic Health Initiatives
Corporate Responsibility Office
303-383-2730

Catholic Health Initiatives
Ethics at Work Line
1-800-261-5607

GETTING HELP

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.
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 - Enter “Catholic Health Initiatives” in the “Enter Organization Name” box and submit. You will be directed to Catholic Health Initiatives’ Ethics at Work website.

See page 48 for a detailed description of the reporting process.



Imagine better health.SM

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