

THE CALL TO INTEGRITY AND COMPLIANCE

Code of Conduct Manual



Sisters of Charity
of Leavenworth
Health System

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“But as for me, I will walk in my integrity.”

Psalm 26:11



Sisters of Charity
of Leavenworth
Health System

The cover design symbolizes the fact that we are walking together on a journey to integrity. This is a commitment we make by virtue of our association with the Sisters of Charity of Leavenworth Health System.

Mission

We will, in the spirit of the Sisters of Charity, reveal God's healing love by improving the health of the individuals and communities we serve, especially those who are poor or vulnerable.

Vision

SCLHS will realize its Mission through the unyielding pursuit of performance excellence, innovative growth and health care for all.

Core Values

Excellence
Respect
Response to Need
Stewardship
Wholeness



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Call to Integrity and Compliance— Letter from the President and CEO

When we encounter or experience a person of deep integrity, we instantly sense wholeness, honesty and consistency with values. The individual is trustworthy, purposeful and someone with whom we want to be associated. He or she understands what is right and follows through with right actions.

As described in this *Code of Conduct Manual*, it is this sense of integrity that we want to promote and embody across the Sisters of Charity of Leavenworth Health System (SCLHS). In an age of increasing complexity of the health care delivery system nationwide, it is increasingly important that all of us clearly understand our call to be responsible and accountable in all matters relevant to integrity and compliance. This encompasses complying with rules and regulations; meeting and exceeding service expectations; and acting in accordance with our Mission and Core Values and with the tradition of our founders, the Sisters of Charity of Leavenworth (SCLs).

Our SCL heritage and our SCLHS Mission and Core Values provide the inspiration and the foundation for why we serve and how we should serve with integrity at our Care Sites and at the System Office. Job descriptions, policies and procedures, accreditation standards, letters of agreement and other documents further clarify and define how we should act in our relationships with patients and their families, physicians, one another, vendors, payers, the government and others.

From the security officer to the registered nurse, from the billing clerk to the chaplain, from the housekeeper to the CEO, we are called to be people of integrity within our specific jobs and roles. Persons in leadership positions have an even greater responsibility to be role models, to ensure that our employees understand this obligation, and to foster a culture of integrity and compliance across SCLHS and our Care Sites.

We act as people of integrity and in compliance with laws and regulations because this is the right thing to do in support of our Mission and Values. This manual is a guide to build upon that foundation and to elaborate further upon what it means to act with integrity and compliance. We encourage you to seek further clarification from your supervisor or your Care Site Compliance Officer who is a resource if you have questions or concerns.

Just as you recognize someone as a person of integrity, our goal is that SCLHS maintain our identity as a Health System of deep integrity in all of our interactions, service delivery and compliance. We are counting on you to help us sustain this valuable reputation in the spirit of our Mission and Core Values.

Thank you.



Mike Slubowski
President and CEO

Introduction

Mission and Values foundational

Why does the Sisters of Charity of Leavenworth Health System (SCLHS) have an Integrity and Compliance Program and a *Code of Conduct Manual*?

As a Catholic Health System, we are committed to ensuring that our employees, volunteers, physicians, vendors and others associated with SCLHS act legally and ethically. We want everyone who works for or within our organization to know the right thing to do and to act rightly in all relationships and interactions associated with their responsibilities and jobs.

Our SCLHS Integrity and Compliance Program is highly consistent with our Core Values. Our Core Values are the foundation for what we do and how we act toward others and the basis of our decision-making process. These Values guide us in our daily efforts to fulfill our Mission of improving the health of the communities and patients we serve, especially those who are poor or vulnerable. Our sense of integrity flows from our Core Values.

As an organization committed to compliance, SCLHS has assumed certain responsibilities. Our Integrity and Compliance Program ensures that SCLHS meets requirements of the Federal Sentencing Guidelines and follows advice of the Office of the

Inspector General of the U.S. Department of Health and Human Services.

What is integrity?

Integrity means wholeness created out of honesty and consistency of actions, values, behavior, methods, measures, principles, expectations, character and outcomes. Just as wholeness and integrity are essential for a healthy human being, integrity is essential for a healthy and effective organization. This manual communicates an internally consistent set of standards, policies and practices on which we base our compliance thinking and actions.

Responsibility and accountability are necessary for maintaining our integrity. In performing our jobs every day and at every location, all of us are responsible and accountable for doing the right thing (honest and ethical decisions and actions) and for doing a thing right (in compliance with laws, regulations, requirements and policies).

What does compliance mean?

Compliance means that we abide by relevant laws, rules and regulations. System Office and Care Site programs, policies and guidelines further clarify and define specific requirements and responsibilities for our daily actions and interactions. Our integrity and compliance responsibilities and obligations exist because of our relationships, actions and transactions



with patients, payers, government programs, regulators, physicians, other health care providers, subcontractors, independent contractors, vendors, consultants and one another.

Our vision is to create and sustain an effective Integrity and Compliance Program that brings clarity and value to our organization and that continuously fosters an organizational culture of integrity and compliance.

Purpose of this manual

This manual provides guidelines of the SCLHS Integrity and Compliance Program. Its content touches employees, physicians, vendors, suppliers and other partners with whom we interact. An essential element of a consistent compliance framework for SCLHS is that we apply these standards uniformly and transparently across our organization. Our Integrity and Compliance Program is universal and applies to each of us, including leaders. By leaders we mean Board members, Senior Leaders, physician leaders, Department Directors, Managers and Supervisors.

This SCLHS *Code of Conduct Manual* communicates essential standards that govern our actions and business. The goal of this manual is to guide and assist us in performing our SCLHS jobs and activities with integrity in alignment with our Mission, Core Values and Vision, and in compliance with all laws, regulations and requirements.

In support of our Mission and Values, it is important that you read and understand these guidelines and abide by them as you perform your job. This will help ensure that we all carry out our roles with the integrity that is core to our heritage and tradition as a Catholic health care provider.

Beyond this manual

In addition to following all laws, regulations and SCLHS System Office requirements, we are also expected to access, review, know and follow the requirements, policies and procedures specific to our Care Sites. Please check with your supervisor to become familiar with policies and procedures for your department and your Care Site.

Integrity asks, “Should we do this?”
Compliance asks, “Can we do this?”

Code of Conduct

This code is a practical extension of our SCLHS Core Values. It more fully describes how we expect employees and others associated with our Health System to conduct themselves to promote and protect the integrity of our organization. We adhere to the highest standards of individual and organizational ethical and legal business practices and represent SCLHS accurately and honestly in the spirit of our Mission and Core Values by observing the following Code of Conduct.



What this means for SCLHS Leaders

- Set an example through your words and actions that demonstrates your commitment to integrity and compliance.
- Make consistent choices based on honesty and integrity.
- Acknowledge and address integrity and compliance problems.
- Never retaliate against anyone who has reported a potential compliance issue.
- Follow the standards, policies and procedures of the SCLHS Integrity and Compliance Program.

SCLHS Code of Conduct

- We are committed to treating everyone we encounter and with whom we interact with dignity and respect in support of providing patient-centered care.
- We are committed to being good and trustworthy stewards of the resources entrusted to us.
- We are committed to conducting all activities in compliance with applicable laws and regulations.
- We are committed to conducting activities and relationships with others so as to avoid conflicts of interest.
- We are committed to maintaining the confidentiality of patient information and to protecting confidential and proprietary information about our organization and employees.

What this means for each person associated with SCLHS

- Conduct all of your SCLHS responsibilities, relationships and activities with integrity—always be honest, fair, dependable and consistent.
- Follow and comply with all applicable laws, regulations and requirements governing SCLHS business conduct.
- Follow all SCLHS and Care Site policies and procedures.
- Avoid conflicts of interest between work and personal matters.
- Speak up about behaviors or actions that appear to be inconsistent with our Code of Conduct.

Culture of Dignity, Respect and Patient-centered Care

SCLHS Code of Conduct

We are committed to treating everyone we encounter and with whom we interact with dignity and respect in support of providing patient-centered care.

Dignity and respect for each individual person are the basis for maintaining right relationships with patients, co-workers, physicians and others with whom we interact. This approach involves compassion, customer service and communication, and requires us to maintain high standards for providing quality, patient-centered care.

Positive work environment

There is a direct correlation between our work environment and the quality of care we provide. Having a positive work environment allows all of us to focus on the needs of patients—our customers—and further requires that we avoid conduct that disrupts or otherwise interferes with the work at hand.

At SCLHS, everyone is expected to live the “Golden Rule” and treat others as they would like to be treated. We respect the diversity of others, avoid inappropriate physical contact, respect the privacy of others and communicate in a polite and honest manner—always mindful that our priority is delivering the highest standard of quality patient care.

Quality, safety and patient rights

Patient care is our core business. SCLHS commits to appropriate, compassionate and respectful patient-centered care that is safe, reliable and cost-effective and that provides each patient with an exceptional, high quality care experience. This means that each of us acts in the best interests of patients and recognizes and ensures their rights.

We provide services in accordance with the professional standards that pertain to our positions. We follow policies and procedures that promote a safe patient care environment. We are attentive to programmatic and best practice requirements, measures and standards relating to quality of care, safety and patient rights.

Ethical and Religious Directives for Catholic Health Care Services

SCLHS and our Care Sites follow the *Ethical and Religious Directives for Catholic Health Care Services*. These directives provide ethical standards and authoritative guidance for care delivery



in Catholic institutions. We encourage our patients to participate in considering ethical issues that arise in their care. Mission and Ethics Leaders at our Care Sites and the System Office are available to assist with ethical conflicts related to patient care.

Patient involvement in decision-making

We involve patients, their family members and representatives in care decision-making, including respecting patient and family preferences, when appropriate. We respond to requests for information, input or assistance in a timely and supportive manner. We explain available options for care, and we obtain patient consent for treatment. We disclose unanticipated outcomes to patients and their families.

Complaint resolution

Our culture of respect provides patients and their families with the opportunity to express their complaints when they are not satisfied with some element of the care they receive. Each Care Site clearly informs patients in writing how they can voice concerns and complaints and how we strive to resolve them promptly.

EXAMPLES

Examples that violate dignity, respect and patient-centered care

- A technician uses profane language in a patient care area as she expresses her feelings about her supervisor and her recent evaluation.
- The supervisor discusses an employee’s family situation in a conversation with another staff member.
- Co-workers treat an employee badly who previously reported another employee for misuse of Care Site property.

Culture of Stewardship

SCLHS Code of Conduct

We are committed to being good and trustworthy stewards of the resources entrusted to us.

At SCLHS, the expectation is that our employees act in good faith and in the best interest of our Mission. This involves careful and prudent use of our resources—time, equipment, money and records.

Personal use of SCLHS assets

SCLHS and Care Site equipment, supplies, materials or services are to be used only in support of our Mission and related business purposes. This includes your time on the job and use of proprietary information about Care Sites and the Health System. Employees should not use SCLHS assets and resources for personal business or for any unauthorized purpose.

Internal control

SCLHS has standards and procedures to ensure that our assets are protected and properly used, and that financial records and reports are accurate and reliable. All SCLHS employees share responsibility for maintaining and complying with required internal controls.

Financial reporting

All financial reports, accounting records, research reports, expense accounts, records of time worked and other documents must accurately and clearly represent the relevant facts or true nature of each transaction. Improper or fraudulent documentation is contrary to SCLHS policies and practices and may be illegal.

EXAMPLES

Examples that counter our culture of stewardship

- The cashier keeps an IOU list for employees who forget to bring money to the cafeteria to pay for lunch and snacks.
- The clerk uses her hospital computer to make appointments for her part-time job as a realtor.
- The marketing representative inflates the miles on his travel log to compensate for rising gasoline prices.



Culture of Legal and Regulatory Compliance

SCLHS Code of Conduct

We are committed to conducting all activities in compliance with applicable laws and regulations.

At SCLHS, we conduct all activities in compliance with laws and regulations applicable to fraud, waste and abuse; self-referral prohibitions; anti-kickback law; record retention; and cooperation with government entities.

Fraud, waste and abuse

SCLHS Care Sites treat and care for patients covered by Medicare, Medicaid and other government programs and abide by the laws, regulations and program requirements that exist to protect these programs from fraud, waste and abuse. Fraud, waste and abuse can result not only from intentional misconduct, but also from mistakes and actions leading to unintended circumstances that can be viewed as misconduct or waste. The federal False Claims Act makes it a crime for any person or organization to knowingly make a false record or file a false claim with the government for payment.

Across our Care Sites, we do not present or cause to be presented claims for approval or payment that are false, fictitious, fraudulent, inaccurate or incomplete. We do not destroy

information considered part of the official medical record. Furthermore, we require that those individuals performing coding and/or billing services have the skills and quality control processes necessary to ensure that claims, coding and billing of government and commercial insurance programs are accurate, complete and in compliance with applicable laws, regulations and requirements.

Physician self-referral prohibitions

Federal law (the Stark self-referral statute) prohibits physicians from referring patients to an entity for “designated health services” (including inpatient and outpatient hospital services) if the physician or a member of the physician’s immediate family has a financial relationship with or interest in that entity, unless an exception applies. Stark also prohibits an entity from presenting a claim to Medicare or to any person or entity for these services and requires a timely refund of any amounts collected for services performed under a prohibited referral.

Anti-kickback law

The anti-kickback law protects patients and federal health care programs from fraud and abuse. This law means that System and Care Site employees, Medical Staff members, and other service and care providers cannot offer, accept, request, solicit, give, pay or receive bribes, kickbacks, money, compensation, non-monetary compensation or other benefit or value in exchange for patient referrals, purchases, leases or orders. All agreements, contracts and other referral sources are to follow applicable laws, regulations and requirements.

Record retention

We retain records, documents, email and other communications for the appropriate and legally required length of time described in our SCLHS and

Care Site document retention policies. We do not destroy documents before the permitted date or if we have been requested to retain them.

Cooperation with government inquiries

We cooperate with reasonable demands made in federal, state or local government inquiries. At the same time, we consult with our Care Site Compliance Officer or the SCLHS Legal Department before responding to any non-routine requests to ensure that contacts with government entities are handled properly. We are always clear and truthful in what we say during government inquiries. We never alter or destroy records if we are aware of an existing or potential government inquiry.

EXAMPLES

Examples that reflect failure to comply with applicable laws

- A surgeon documents in the medical record that he made four post-operative visits to the patient's room when he only made two.
- The billing clerk submits a claim for medically unnecessary services or supplies; with insufficient documentation; or that has been miscoded.
- The coder changes a diagnosis code at the request of the attending physician without supporting documentation.
- A physician accepts payment from a home health agency for referring patients to the agency's services.



Culture of Transparency

SCLHS Code of Conduct

We are committed to conducting activities and relationships with others so as to avoid conflicts of interest.

What is a conflict of interest?

A conflict of interest exists when a financial or personal relationship impacts or otherwise influences your decision, especially involving transactions with vendors. The potential for a conflict extends not only to you, but also to your family members. SCLHS has a Conflict of Interest Policy that provides standards of behavior to ensure decisions are made for the right reasons and in support of our Mission. This means that employees put the interests of the organization before their own personal interests, or those of their family members.

As part of that policy, Board members, Senior Leadership, Management and others in a position to enter into transactions on behalf of SCLHS or

our Care Sites are required to complete annual statements disclosing any and all potential conflicts of interest. The Chief Compliance Officer carefully reviews these statements and monitors them, as needed, to avoid conflict of interest situations.

Gifts

At SCLHS, we conduct our business transactions fairly, at arms-length and free from offers or solicitations of gifts and favors, or other improper inducements. We expect our services and business relationships to stand on their own merit and not to result in personal gain. We do not offer, ask for, accept or give gifts, services, improper discounts, kickbacks or other items of value to influence the business actions of any suppliers, vendors, contractors, employees or other third parties.

EXAMPLES

Examples of a conflict of interest

- A department manager purchases goods from a vendor because his family member has a financial interest in the business.
- A surgeon chooses to use a particular surgical implant device because she has a financial relationship with the vendor.
- A Board member votes to select a contractor to complete construction work for the hospital because he is a partner with the contractor in another business.

Culture of Trust with Confidential Information

SCLHS Code of Conduct

We are committed to maintaining the confidentiality of patient information and to protecting confidential and proprietary information about our organization and employees.

At SCLHS, we take seriously our responsibility to protect the privacy and confidentiality of all medical and other information entrusted to us. We receive and work with information in many forms—electronic or paper records, emails, voice messages or communications during meetings or conferences. Much of this information is confidential, sensitive and proprietary.

Privacy of patient information

In order to provide quality care, we collect and use medical, financial and other information that is personal and private to our patients. This is called protected health information (PHI). Patients expect that we will keep this information about them private and secure. We access this information and share it with co-workers only when authorized and for purposes of doing our jobs.

The Health Insurance Portability and Accountability Act (HIPAA) includes rules to protect the privacy and security of patient information. HIPAA requires that SCLHS have policies and procedures to guide employees, physicians, volunteers and vendors on how to access, use and disclose individually identifiable patient information, and how to handle situations where patient information is misused. A Notice of Privacy Practices is provided to each patient that clearly states what the person's rights are under HIPAA and how our Care Sites can utilize individual patient information.

Proprietary information

We also maintain the confidentiality of proprietary information about our organization.

Information is described as proprietary when it rightly and exclusively belongs to someone else—another person or organization such as our Care Site.



Information, ideas and what are called “intellectual property assets” of SCLHS are important to our organization. This includes information about our competitive position or business strategies, and payment and reimbursement information. Employees are expected to ensure that intellectual property—including patents, trademarks, copyrights and software—is maintained and managed to preserve and protect its value. We protect and share this type of information only with others who need it to perform their jobs.

Personnel records/matters

We treat information related to employees—salaries, benefits, and personal and personnel matters—as confidential according to applicable Human Resources policies. Employees whose jobs require access to or review of personnel files maintain confidentiality and use this information solely for purposes of completing their role responsibilities.

EXAMPLES

Examples that violate trust with confidential information

- A nurse reviews the records of her neighbor who was recently admitted to another unit of the hospital.
- The med tech tells his wife that he visited with an old schoolmate who had lab work drawn in the outpatient center.
- A staff member discloses medical information to a family member who is not on the patient's list of persons authorized to receive such information.

Reporting Expectations

Responsibility to report

If you become aware of a potential compliance issue or concern, you are required under SCLHS standards to report it immediately to your supervisor, the Compliance Officer or the SCLHS Integrity Line. SCLHS has a strict policy against retaliation, meaning no one is permitted to retaliate against the person who in good faith reports an issue, even if the issue ends up not being a compliance matter.

Failure to comply with the SCLHS Code of Conduct

Individuals will be held accountable for actions and behaviors that are inconsistent with our SCLHS Code of Conduct. Violations could result in disciplinary action, up to and including termination of employment, suspension of Medical Staff privileges, or termination of business relationships. Conduct that violates the law can also result in civil and criminal penalties ranging from fines to imprisonment.

EXAMPLES

Examples that could result in discipline include:

- Violating laws, regulations or requirements.
- Directing or requesting others to violate laws, regulations or requirements.
- Failing to raise a known or suspected compliance violation promptly.



For Help or More Information

Your Care Site has an individual—the Compliance Officer—who has overall responsibility for your Integrity and Compliance Program. If you are in doubt about an issue or you have a concern, please discuss the issue with your immediate supervisor, a Human Resources representative, the Compliance Officer or your SCLHS Legal representative. If speaking with one of these individuals does not seem to be the best option for you, another reporting option is the SCLHS Integrity Line.

SCLHS Integrity Line— 1-800-843-4359

The SCLHS Integrity Line is available to all employees, volunteers and physicians for communicating an integrity or compliance issue or concern. You can call this toll-free number 24 hours a day, seven days a week to report information you may have regarding a possible violation of law or an integrity issue.

- The SCLHS Integrity Line is confidential—you do not have to give your name.
- A trained communication specialist takes notes as you describe your concern. Calls are not tracked, traced or recorded.
- Questions may be asked of you during the call to gather additional information. You can report whatever it is that concerns you. Even if your information is incomplete, it could help keep a serious situation from developing.
- At the close of the call, you will receive a unique identification number and a specific date to call back to check on the status of your concern.
- A confidential report about your call will be forwarded to your Compliance Officer for review, investigation and, when appropriate, corrective action.
- You should feel comfortable providing information about possible integrity or compliance violations.

Acknowledgment and Participation Form

Each year, the Sisters of Charity of Leavenworth (SCLHS) asks you to acknowledge your awareness and understanding of and obligation to follow laws and regulations applicable to your function and job and the SCLHS Integrity and Compliance Program requirements. It is your obligation to raise and communicate in good faith any issues, concerns or problems involving possible violations of applicable laws, regulations or requirements.

Participation in activities and training relating to the SCLHS Integrity and Compliance Program is required, should be made part of all employee performance reviews, and is considered in decisions regarding hiring, promotion and compensation.

I acknowledge that:

- I have received and reviewed the SCLHS *Code of Conduct Manual* and understand it represents organizational policies that are mandatory.
- I will report in good faith potential compliance issues, concerns or problems to my supervisor, to the Integrity and Compliance Department, to the SCLHS Integrity Line, or to another channel specified within the SCLHS *Code of Conduct Manual*.
- I am aware that if I violate laws, regulations or SCLHS requirements, such behavior may result in disciplinary action.

Signature

Date

Printed Name

Office Telephone Number

Employee ID Number

Care Site/Work Location