

# Corporate Responsibility Program



*A Mission based on Values and Ethics*

## CEO MESSAGE

Columbia St. Mary's carries out its healthcare ministry consistent with the Ascension Health Mission, Vision and Values. Integrity is one of Ascension Health's Core Values. The essence of integrity is a workplace in which we follow ethical and legal business practices.

The Standards of Conduct describe the behavior and conduct expected of Health Ministry associates; medical staff; Board and Board Committee members; and contractors. The Standards of Conduct are intended to help you respond to questions and situations you may encounter in your daily work. Please read it carefully and consider what it says.

No Standards of Conduct can anticipate every question or substitute for each individual's sense of honesty and integrity. If you have questions about the Standards of Conduct or come across any situation which you believe violates the Standards, you should consult your Supervisor, your Health Ministry Corporate Responsibility Officer or the Values Line at 1.800.707.2198 or [www.AscensionHealthValuesLine.org](http://www.AscensionHealthValuesLine.org). There will be no retaliation for asking questions or reporting possible compliance issues in good faith.

Our commitment to corporate responsibility begins and ends with each individual. Thank you for joining us in our shared commitment to the Standards of Conduct.



Mark Taylor

President / Chief Executive Officer

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# Standards of Conduct

## Standard of Conduct Definitions

The following words and phrases have the following meanings as used in the Standards of Conduct.

**Contractors** are third party organizations with which we do business, such as vendors that provide supplies and services.

**Health Ministry** is the organization in a regional or local area through which Ascension Health carries out its mission and in which Ascension Health serves as the sole or controlling member.

**Model Community** is our mutual commitment: Ascension Health's organizational commitment to Associates for their full flourishing - personally and professionally - and Associates' personal commitment to the Ministry and one another, all in service of our Mission.

**Retaliation** is a harmful action against an associate in response to the associate asking questions or reporting a concern.

**Values Line** is a confidential phone and internet web service for associates to report ethical and legal issues without providing their name.

# Introduction

This booklet details the Mission, Vision and Values of Ascension Health; explains the Standards of Conduct we are responsible for practicing; and describes ways for associates to find help and report ethical and legal issues.

## Responsibilities of Associates, Medical Staff, Leaders, Board and Board Committee Members and Contractors

The Standards of Conduct apply to all associates, medical staff members, Board and Board Committee members, and contractors. You are expected to:

- Review and follow the Standards of Conduct, paying particular attention to those Standards of Conduct that apply to your every day work responsibilities.
- Ask questions when you are uncertain what to do. See Page 13 on Where to Find Help.

## Responsibilities of Leaders

Leaders have a role in receiving and responding to questions and concerns raised by associates and others you lead. How you respond to these questions and concerns is key to others having the trust and confidence to bring important matters to your attention.

You are expected to:

- *Serve as a role model for our Mission, Vision and Values by carrying out your responsibilities with the highest degree of personal integrity.*
- *Clearly communicate to others your expectations for the highest standards of ethical behavior.*
- *Promote a culture of trust, open communication and respect.*
- *Hold those you lead accountable for behavior consistent with the Standards of Conduct.*

- *Encourage others to raise issues and concerns so they can be addressed.*
- *Respond timely and appropriately to issues and concerns brought to your attention and forward concerns expressed by your staff to the Corporate Responsibility Officer, Human Resources or other appropriate leaders. See Section entitled Your Voice: Where to Find Help for additional information.*
- *Support our policy of non-retaliation for anyone who raises issues and concerns in good faith.*
- *Learn and follow applicable laws and regulations that affect your work.*
- *Ask for assistance when you are unsure how to respond to an issue or concern.*

## Responsibilities of the Board and Board Committees

Members of the Board and Board Committees have a responsibility to be informed and exercise appropriate judgment to:

- Ensure that legal and ethical business practices expressed in the Standards of Conduct guide the decisions you make on behalf of the Health Ministry.
- Disclose any potential Conflicts of Interest and take appropriate actions to address any situations that may appear to interfere with independent judgment or the duty to serve in the best interest of the Health Ministry.
- Hold senior leadership accountable for effective policies, procedures and internal control systems that address compliance with laws and regulations and promotion of ethical business practices.
- Respond timely and appropriately to issues and concerns brought to your attention.

The following Standards of Conduct are a foundation for the behaviors that are expected from associates; the Medical Staff; Board and Board Committee Members and Contractors. Each Health Ministry may have additional policies and procedures related to specific expectations in the Standards of Conduct. Please consult your Health Ministry's policies and procedures for additional information.

# MISSION, VISION AND VALUES

Our Mission, Vision, and Values provide a strong foundation and guidance for the work we do in transforming healthcare in the United States. They serve as a framework that expresses our priorities in responding to the care of those most in need.

## Mission

Rooted in the loving ministry of Jesus as healer, we commit ourselves to serving all persons with special attention to those who are poor and vulnerable. Our Catholic health ministry is dedicated to spiritually centered, holistic care, which sustains and improves the health of individuals and communities. We are advocates for a compassionate and just society through our actions and our words.

## Vision

We envision a strong, vibrant Catholic health ministry in the United States which will lead to the transformation of healthcare. We will ensure service that is committed to health and well-being for our communities and that responds to the needs of individuals throughout the life cycle. We will expand the role of laity, in both leadership and sponsorship, to ensure a Catholic health ministry of the future.

## Values

We share a common vision and are called to act upon the following ideas and beliefs:

### ***Service of the Poor***

Generosity of spirit, especially for persons most in need

### ***Reverence***

Respect and compassion for the dignity and diversity of life

### ***Integrity***

Inspiring trust through personal leadership

### ***Wisdom***

Integrating excellence and stewardship

### ***Creativity***

Courageous innovation

### ***Dedication***

Affirming the hope and joy of our ministry.

## STANDARDS OF CONDUCT

# Follow the *Ethical and Religious Directives for Catholic Health Care Services*

The *Ethical and Religious Directives for Catholic Health Care Services (Ethical and Religious Directives)* express the Catholic Church's teaching on the dignity of the human person and the common good. They are made up of principles that guide our response to ethical issues in health care.

These principles include:

- Promote the dignity of all, care for persons who are poor, and contribute to the good of the community
- Respect the sacredness of human life from the moment of conception to death
- Provide compassionate care and relief of pain and suffering for the dying
- Treat our patients with respect, trust, honesty and confidentiality

All Catholic health care organizations must adopt the *Ethical and Religious Directives* as policy and require associates and medical staff members to follow them. They also require Catholic health care organizations to provide education regarding the Ethical and Religious Directives. Your Health Ministry can provide you with a copy of the *Ethical and Religious Directives* and they are also available at:

<http://usccb.org/about/doctrine/ethical-and-religious-directives>.

### What is Expected of Me?

- Follow the *Ethical and Religious Directives* while working within your Health Ministry.
- As appropriate, be familiar with the *Ethical and Religious Directives* and participate in ethics education programs your Health Ministry may offer.
- Talk to your Supervisor, the Health Ministry Ethics Committee or Vice President, Mission Integration, when you have a question about the *Ethical and Religious Directives*.
- Respect the Health Ministry's religious identity and promote its commitment to the Catholic Church's moral teaching.

Q  
A

*I am not Catholic nor is my patient. Am I still required to abide by the Ethical and Religious Directives when treating my patient?*

Yes. When a health care professional and patient use Catholic health care, they accept its public commitment to the Church's understanding of the dignity of the human person. All physicians, nurses, staff and associates are required to abide by the Ethical and Religious Directives while working within the Health Ministry. The Ethical and Religious Directives do not require anyone to participate in an action, procedure or intervention that is contrary to their conscience or legal rights, or without their free and informed consent or, in the case of an emergency, their implied consent.

## STANDARDS OF CONDUCT

# Deliver Clinically Excellent and Safe Patient Care

We deliver spiritually centered care to our patients that support the physical, mental, emotional, social and spiritual needs of the person. Clinically excellent and safe care requires an organization that is highly reliable and dependent on each associate's and medical staff member's participation in a culture of High Reliability. A High Reliability Organization is one that delivers on what it intends to do, putting in place systems, processes and behaviors to build strong teams that will prevent errors and improve all areas of safety and experience for patients and associates.

### What is Expected of Me?

Whether you are directly involved in the delivery of care to patients or in a role that supports such services, you are expected to:

- *Follow the behaviors of a High Reliability Organization that provides our patients, visitors and associates with a safe environment that is free of preventable injury.*
- *Follow the Health Ministry's policies and procedures that promote a safe environment for patients, visitors and associates.*
- *Deliver services with compassion and respect for the dignity for every patient.*
- *Provide appropriate care to all people without regard to race, religion, national origin, color, age, disability, marital status, sexual orientation, gender, genetic information, amnesty, status as a covered veteran or any other legally protected status in accordance with applicable federal, state, and local laws.*
- *Encourage patients to participate in decisions about their care by providing them with access to information in a manner that they can understand and will enable them to make free and informed decisions.*
- *Do not disclose confidential information about patients or their care to any unauthorized person or organization.*
- *Do not access confidential information about patients or their care unless you have a need to know the information in order to perform your job.*
- *Have a positive, courteous and customer-service oriented attitude and approach to all persons you meet.*
- *Maintain complete, timely and accurate medical records. Document the medical necessity of patient care in the patient's medical record.*
- *Maintain current professional licenses, certifications and other credentials in accordance with professional standards and regulations that apply to your position.*



## STANDARDS OF CONDUCT

# Foster a Model Community of Inspired Associates

Associates are at the core of our service as a Catholic health ministry.

Model Community is our mutual commitment: Ascension Health's organizational commitment to Associates for their full flourishing - personally and professionally - and Associates' personal commitment to the Ministry and one another, all in service of our Mission.

Model Community is rooted in the belief that associates deserve a respectful workplace in which their voice is heard and a clear view of how their work supports the mission. Safe, effective and reverent care can only be provided by inspired people who:

- have the required skills, knowledge and equipment to do their jobs,
- are focused on our Mission, and
- feel that they are safe, cared about, recognized and appreciated.

### What is Expected of Me?

- *Treat others fairly, honestly and with dignity.*
- *Treat others respectfully, without regard to race, religion, national origin, color, age, disability, marital status, sexual orientation, gender, genetic information, amnesty, status as a covered veteran or any other legally protected status in accordance with applicable federal, state, and local laws.*
- *Communicate with others openly, honestly and respectfully.*
- *Be supportive of others and work as a team.*
- *Be committed to ongoing learning, including training or educational opportunities.*



*I heard a co-worker making racially offensive jokes with other co-workers. It made me really uncomfortable. What should I do?*

Immediately report the incident to your Supervisor, the Human Resources Department, your Corporate Responsibility Officer or the Values Line.

## STANDARDS OF CONDUCT

# Be Honest and Fair in our Business Conduct

We are committed to ethical business conduct and integrity. We act in the best interest of the Health Ministry, protect the confidentiality of information and represent the Health Ministry honestly and accurately.

### What is Expected of Me?

#### CONFLICTS OF INTEREST

- Follow your Health Ministry Conflicts of Interest Policy. Do not engage in any activity, practice or act that conflicts with the interests of the Health Ministry.
- Follow your Health Ministry Gifts Policy. Seek guidance before accepting gifts from vendors, patients or others.
- Do not make any decision or discussion affecting the Health Ministry that might represent a conflict of interest when serving as a member of an outside organization or Board.
- Do not accept employment or consulting arrangements outside of the Health Ministry, or make personal investments if they interfere with your job or unduly influence the decisions you are required to make on behalf of the Health Ministry.

#### CONFIDENTIALITY

- Do not access information, such as protected health information in patient medical records, except when you have a legitimate need to know the information in order to perform your job.
- Do not disclose confidential information related to the Health Ministry to any outside unauthorized person or organization, or use such information for your personal benefit.
- Share confidential information about the operations of the Health Ministry with associates only when they have a legitimate need to know the information in order to perform their job.
- Maintain confidential information, including financial data and associate related information, in a confidential, secure manner according to Health Ministry policies and applicable law.
- This should not be interpreted to prohibit associates from discussing the terms and conditions of their employment.

# Q

*Before coming to work at the Health Ministry, I consulted for a competitor and obtained information that would help our hospital negotiate favorable contracts. Should I share this information with others in the organization?*

# A

No. Do not disclose confidential information learned through another job. It is unethical and possibly illegal to share confidential information you learn from your association with one employer with another employer should you leave the organization. Further, we will not be able to use this type of information in any business dealings.

## BUSINESS AND ETHICAL PRACTICES

- Prepare all documents accurately and timely, including expense reports, time and attendance records, financial statements, and accounting records.
- Follow Health Ministry policies and procedures to keep internal financial controls.
- Deal with regulatory agencies, insurance companies and accrediting agencies honestly and accurately. This includes the submission of claims for only medically necessary services and supplies ordered by a physician and provided to the patient.
- Do not violate patents, trademarks, copyright and software licenses.
- Properly use and protect Health Ministry resources including supplies, equipment, associate time and financial assets.
- Follow Health Ministry policies when you access or send information electronically, including compliance with Health Ministry policy related to litigation holds.
- Act only within the scope of the authority granted with your job.
- Ensure that marketing and advertising practices, materials and announcements are truthful, informative and transparent.

Q  
A

*My sister-in-law is a health care consultant. Would it be a conflict if I recommended her to work on a project at my organization?*

No, unless you do something to provide her with an advantage or special consideration or if you receive something of value in return. If you recommend your sister-in-law for the project, you should fully disclose your relationship. You should not participate in the selection decision. Also, you must not share information with your sister-in-law that other prospective vendors or consultants would not have.

## STANDARDS OF CONDUCT

# Comply with Laws and Regulations

Our policy is to comply with all applicable laws and regulations. These laws and regulations apply to many areas throughout the Health Ministry.

### What is Expected of Me?

- *Follow all laws and regulations that apply to your work and ask for assistance if you have questions about how they affect you.*

**The following are examples of laws and regulations that apply to the Health Ministry.**

- *Follow billing and coding requirements of the government (e.g., Medicare and Medicaid) and other third parties who pay for the healthcare services we provide.*
- *Ensure that physician arrangements comply with Stark and Anti-Kickback laws and regulations. Do not pay or offer to pay anyone for referrals of patients.*
- *Do not have relationships with individuals or entities that have been excluded from participation in federal and state healthcare programs. This includes associates, medical staff and contractors.*

- *Maintain the privacy and security of protected health information in keeping with HIPAA and the Health Information Technology for Economic and Clinical Health Act (HITECH). Do not access, use, disclose or discuss protected health information with others unless permitted to do so or required by law.*

- *Hire, train, promote, place, transfer, layoff, recall, pay and terminate associates based on an evaluation of work performance, their own achievements, experience and conduct without regard to race, religion, national origin, color, age, disability, marital status, sexual orientation, gender, genetic information, amnesty, status as a covered veteran or any other legally protected status in accordance with applicable federal, state, and local laws.*

- *Ensure that reports or other information required to be provided to any federal, state or local government agency, including Medicare and Medicaid cost reports, are filed accurately and timely to comply with applicable laws and regulations.*
- *Follow the Ascension Health System Procedure regarding political campaign activities.*
- *Do not participate in any activities that may harm our tax-exempt status, such as providing benefits to a private individual or organization for less than fair market value.*
- *Avoid discussions and collaborations with competitors about pricing, terms and other market information in compliance with Antitrust Laws.*
- *Follow the Emergency Medical Treatment and Active Labor Act (EMTALA) in providing an emergency medical screening examination and stabilizing medical care to all patients who come to the hospital in an emergency medical condition, regardless of ability to pay.*
- *Follow Federal and State laws and regulations in any research, investigations and clinical trials conducted by our physicians and medical staff. Protect the rights and privacy of research subjects during research, investigations and clinical trials.*
- *Comply with applicable environmental laws, including the proper handling and disposal of hazardous and infectious waste.*
- *Follow Federal and State laws and regulations on the reporting and management of associate occupational injuries and illnesses including the ongoing completion of the Occupational Safety and Health Act (OSHA) Log of Work-Related Injuries and Illnesses and the annual OSHA Summary of Work-Related Injuries and Illnesses.*

## STANDARDS OF CONDUCT

# Comply with Laws and Regulations

Q

*I am a coder. One of my co-workers told me that she always codes the Medicare “hospital acquired conditions” as being “present on admission” in order for the hospital to receive the higher payment. The physician documentation that the condition was present on admission is not always available; however, I’ve been told that I need to code the claims as quickly as possible and do not have time to go back to the physician and ask questions. What should I do?*

A

Point out to your co-worker that it is illegal to submit false claims to the Medicare program, and that these coding practices are exposing your hospital to potential fines and penalties. You should also discuss the situation with your Supervisor.

Q

*My co-worker recently posted a notice on the associate bulletin board asking associates to join her in forming a group to support a candidate for city council. Is this allowed?*

A

No. Using the Health Ministry’s resources to participate or encourage participation in political campaign activities is not allowed and could jeopardize our tax-exempt status.

Q

*What should I do if my laptop is stolen on a weekend or after business hours?*

A

Contact your Supervisor, Health Ministry HIPAA Privacy and Security Officers and the Ascension Health Information Services Help Desk at 314.733.8144.

Q

*I witnessed a co-worker giving the personal health information of a patient to a patient’s relative who was not authorized to receive the information. What should I do?*

A

Contact your Supervisor, Health Ministry HIPAA Privacy Officer or Corporate Responsibility Officer.

Q

*Dr. Smith 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

The Anti-Kickback statute prohibits offering or receiving anything of value to induce a referral of federal health care program business. We must charge Dr. Smith fair market value for office space. Free or discounted lease arrangements may appear to be an incentive for referrals from Dr. Smith.

# Your Voice: Where To Find Help

You may face circumstances that can leave you wondering which path to take, which choice to make and how to make it. This is particularly true when you are confronted with challenges to your ethical and legal standards.

As a responsible associate, it is your right and duty to find help and report situations that you believe may potentially violate laws, the Standards of Conduct or applicable policies. It is not a question of betraying confidence. It's a question of the continued respect and viability of our organization and professional responsibilities. There are several ways in which you can ask a question or share a concern if you do not know whether a particular action would violate laws, the Standards of Conduct or harm the Health Ministry:

## Your Supervisor or Manager

This is usually the best place to start in getting answers to your questions. Your supervisor or manager may have the information you need or be able to direct you to the right resource.

## Higher-Level Manager

If you are not comfortable discussing a situation with your supervisor or manager or do not agree with the answer you receive, consider discussing the issue with a higher-level manager.

## Medical Staff Affairs

If you are an employed physician or a physician on the medical staff, you are encouraged to contact your Health Ministry Medical Staff Affairs office, Chief Medical Officer or CEO about any issues or concerns.

## Corporate Responsibility Officer

The Health Ministry Corporate Responsibility Officer is responsible for the Corporate Responsibility Program and can assist in addressing your questions and concerns.

Associates in the following departments may be able to assist with questions or concerns:

### Human Resources

Employment-related concerns

### Mission/Ethics

Patient rights or clinical ethical issues

### Risk Management and Quality/Safety Departments

Patient care or workplace safety issues

### HIPAA Privacy and Security Officers

Use and protection of patient health information

## Values Line

We encourage you to use one of the resources above to address your questions and concerns. If you are not comfortable contacting any of these associates or if these associates have not fully resolved your concern, you can call the Values Line at **800.707.2198** or use the Values Line web site at **[www.AscensionHealthValues-Line.org](http://www.AscensionHealthValues-Line.org)**. You do not need to provide your name when reporting concerns through the Values Line.

## Your Voice: Where To Find Help

Q

*How do I use the Values Line? How do you protect the confidentiality of Values Line reports?*

A

The Values Line is available 24 hours a day, seven days a week. Your call to the Values Line is answered by an outside company. Questions may be asked of you to gather additional information. 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. You do not need to provide your name. The calls are not recorded or traced.

The outside company prepares a confidential report based on the information you provide. The report is forwarded to your Corporate Responsibility Officer for review, investigation and, when appropriate, corrective action. The results of the investigation will be provided to the outside company so they may be given to you during your follow-up call.

If you use the web site, there are a series of screens that walk you through the process of preparing and submitting a report. After you submit a report, you will be provided a follow-up date, report number and Personal Identification Number.

Q

*If I report what I think is a violation of the Standards of Conduct, and no violation is found upon investigation, will I get in trouble?*

A

There will be no action taken against you for reporting a suspected violation in good faith. You do not need to provide your name when calling the Values Line.





## APPENDIX A – FALSE CLAIMS ACT

### The False Claims Act

As recipients of federal health care program funds, including Medicare and Medicaid, Health Ministries are required by law to include in their policies and provide all associates and contractors with information about the federal False Claims Act and applicable state laws intended to prevent and detect fraud, waste and abuse in federal health care programs.

#### *WHAT IS THE FALSE CLAIMS ACT?*

The False Claims Act is a federal law that 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. The False Claims Act similarly prohibits any person or organization from knowingly concealing, or knowingly and improperly avoiding or decreasing, an obligation to pay or transmit money to the government. “Knowingly” includes having actual knowledge that a claim is false, or acting in “deliberate ignorance” or “reckless disregard” as to whether a claim is false. Examples of possible false claims include billing Medicare for services that were not provided, billing for services that were provided but were not medically necessary, and submitting inaccurate or misleading claims about the types of services provided, billing for a hospital service referred by a physician with whom the hospital has a compensation arrangement that violates the Stark or Anti-Kickback law, and failing to timely refund an identified known overpayment received from a federal health program.

The False Claims Act contains provisions that allow individuals with original information (i.e., information not already the subject of legal proceedings or activities that have already been publicly disclosed) concerning fraud involving government programs to file a lawsuit on behalf of the government and, if the lawsuit results in a recovery, to receive a portion of recoveries received by the government.

Financial penalties to the organization 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. In addition to fines and penalties, an individual or organization that violates the False Claims Act is subject to exclusion from participation in federally funded healthcare programs.

#### State Laws

In addition to federal law, several states have adopted similar laws allowing individuals to file a lawsuit in state court for false claims that were filed with the state for payment, such as the Medicaid program.

#### Protections Under the False Claims Act

The federal False Claims Act protects employees from being fired, demoted, threatened or harassed by his or her employer for filing a False Claims Act lawsuit or providing information in good faith about a False Claims Act investigation or lawsuit.



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