

Baptist

Hospitals of Southeast Texas

Performing Sacred Work Every Day

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Code of Ethics & Conduct

Standards of Conduct

A guide to help staff members make decisions that are consistent with appropriate legal and ethical standards. Items highlighted in this booklet are broadly described. For more specific information, please ask your manager or review organization policies.

April 13, 2015

Letter from CEO:

Baptist Hospitals of Southeast Texas (BHSET) is committed to providing safe, high quality of care and services to our patients. Everything we do, every day, must support our continued ability to improve the health and quality of life of the citizens of our community. We are committed to achieving our purpose in full compliance with our values as well as all applicable laws, government regulations, third party payor requirements and our own policies towards our customers and employees. We are particularly sensitive to the requirements of federal health care programs and the submission of accurate billings. To ensure that we fulfill our commitment while operating in a complex and highly regulated environment, we have implemented a Corporate Compliance Program

A key element of the Compliance Program is our Code of Ethics & Conduct. The *Code of Ethics & Conduct* are rooted in our mission, vision, and core values, and this document affirms the values and professional standards that already exist among our employees. Everyone, regardless of position, must observe the Code of Ethics & Conduct, as well as all laws, regulations, guidelines, and our facility's policies and procedures. This includes employees, managers, volunteers, our contractors and vendors, members of the Boards of Directors, and anyone else acting on behalf of the organization. Failure to observe the *Code of Ethics & Conduct* can result in serious damage to our reputation, regulatory action and employee disciplinary action.

Our success in this arena requires the active participation of everyone associated with BHSET. If you know or suspect that a law, regulation, policy or our *Code of Ethics & Conduct* are not being followed, you **must** report this information. Managers and supervisors have a special obligation to be available and responsive to employees when questions arise about adherence to the Code of Ethics & Conduct. If you are not satisfied with management's response, raise your concerns to the Compliance Officer or to the highest level of management. Our Corporate Compliance Officer can be contacted by calling the established toll-free Corporate Compliance Hotline number. Reports can be made anonymously, and I can assure you that management will not tolerate retaliation for reporting issues to management, Human Resources, the Corporate Compliance Officer or the Corporate Compliance Hotline.

The Code of Ethics & Conduct are intended to ensure that we meet our compliance goals in today's highly regulated environment. The Code of Ethics & Conduct provide general guidance but do not replace policies and procedures. In the absence of a specific policy, the Code of Ethics & Conduct becomes the policy. The Code of Ethics & Conduct is a "living document" which will be updated periodically to respond to changing conditions. Thus, BHSET reserves the right to change any or all of these provisions at any time.

The Board of Trustees and senior executives of BHSET join me in pledging our full commitment to upholding the *Code of Ethics & Conduct* and the Corporate Compliance Program. I am convinced that our compliance efforts are a critical aspect of our efforts to provide safe, high quality care and services to our community.

Sincerely,



David Parmer, CEO
Chief Executive Officer

Mission

The Baptist Hospitals of Southeast Texas are not-for-profit, community owned, healthcare facilities with spiritual values, dedicated to providing safe, high quality health services and Sacred Work in a Christian environment.

Vision

Baptist Hospitals of Southeast Texas will be the premier healthcare system by creating the best possible outcomes with exceptional patient care experiences. We will accomplish this by keeping quality and patient safety at the core of everything we do.

Values

COMPASSIONATE

RESPECTFUL

ACCOUNTABLE

COMPETENT

COLLABORATIVE

INNOVATIVE

TRUSTWORTHY

Behaviors:

- *Pay attention to detail*
- *Communicate clearly and directly*
- *Have a questioning attitude*
- *Perform effective handoffs*
- *Work together with our team*
- *Follow the rules*

Principle 1: Quality of Care

I am committed to providing high quality care and services. My first responsibility is to patients, their families and the physicians we serve.

- We have a duty and responsibility to address any deficiency or error by reporting it to a supervisor who can assess the problem, take appropriate action and follow the problem to resolution.
- Complete and accurate documentation is important to quality of care, accuracy of billing and coding, and integrity of financial records.
- We will encourage each employee to continually evaluate existing methods of delivering services in order to discover more effective ways of serving our physicians and patients through teamwork.
- We will respect the human dignity of each patient by responding to all patient questions, concerns and needs in a timely and sensitive manner.
- We will effectively communicate to patients in a clear, professional, informed, and understandable manner.
- We will treat all of our customers, including patients, families, physicians, co-workers and all outside contacts, with courtesy, dignity, respect and professionalism.
- We will periodically assess and evaluate the goals and objectives established for medical care and related services provided to assure delivery of services according to current standards of practice, and the most current knowledge in the field.
- We will ensure that admissions, transfers, and discharges are medically appropriate and in accordance with all legal requirements.
- We will employ only fully licensed and properly credentialed providers with proper expertise and experience to care for our patients.
- We will not discriminate against any patient for any reason including race, color, sex, national origin, age, disability, or any other classification protected by law.

Doing the Right Thing Means ...

- Observing and protecting patient and customer privacy and confidentiality
- Informing patients of their right to participate in all care decisions
- Explaining care to patients
- Transferring a patient only after a facility and physician have agreed to accept the patient and the patient has been stabilized
- Providing appropriate medical screening to any patient seeking emergency treatment

COMPASSIONATE

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We are compassionate, concerned and conscientious.

We integrate a faith-grounded approach into our relationships.

We work together cooperatively regardless of status, location or personal differences.

We extend our team spirit to customers, our communities and all our business partners.

We emphasize open, candid, responsive and timely communication and follow-up.

We treat others as they want to be treated.

Principle 2: Laws & Regulations

I work with high standards of business and professional ethics while following applicable federal, state and local laws, regulations and policies.

- I will promptly report possible violations to my supervisor, the Compliance Officer or Compliance Hotline. Management will act on compliance issues or concerns fairly and truthfully.
- I will not offer, provide, solicit or receive kickbacks, bribes, rebates or anything else of value in order to influence the referrals of patients or services.
- We accept patient referrals and admissions based solely on the patient's clinical needs and our ability to render the needed services.
- All agreements, including but not limited to financial arrangements and joint ventures that may be possible referral sources, will be in writing and approved by appropriate management and legal counsel prior to execution.
- We carefully enter into physician contracts so as not to give compensation and/or benefits based on referrals or above fair market value.
- We compete in the market solely on the merit of our services. I will strive to make oral and written marketing information clear, correct and accurate.
- I maintain complete and accurate patient records in accordance with federal and state laws.
- I maintain confidential patient information and limit access and use of patient information, except as allowed by applicable law, for purposes of patient care, treatment, payment and operations.
- We do not hire or contract with individuals who have been excluded or sanctioned by the Office of Inspector General (OIG) of the U.S. Department of Health & Human Services (HHS) or barred from Federal procurement programs.
- I comply with all requirements of the Emergency Medical Treatment and Active Labor Act (EMTALA), including providing a medical screening examination to all who seek emergency treatment.

Doing the Right Thing Means ...

- Being familiar with and following laws, regulations, policies and procedures that affect my job
- Asking questions whenever I am unsure
- Not delaying treatment or medical screening to inquire about payment

RESPECTFUL



We're empathetic, available and ready to help. We are honest and adhere to the high standards of integrity and ethics in dealing with customers, suppliers, our communities and each other.

We operate from a position of transparency in our practices, relationships and commitments.

We believe in doing what is right- even in the face of challenges.

We know our reputation is built upon each of us being accountable and accepting responsibility for our behavior and performance.

We will make our name worthy of trust.

Principle 3: Human Resources

I treat my fellow employees with respect and fairness. I take responsibility for meeting or exceeding expectations.



- I treat everyone with fairness, consistency, dignity and respect.
- I personally strive to provide a work environment free from verbal, physical, sexual harassment, and all other forms of harassment and/or intimidation.
- My performance is reviewed annually in an objective, consistent manner. Promotion decisions are based on individual employee performance, skills, and abilities.
- We provide training opportunities to assist employees to build and maintain professional skills.
- We strive to hire, train, compensate and promote employees on the basis of personal competence without regard to race, color, gender, religion, disability or any other classifications as required by law.
- I do not use social media to post or communicate anything obscene, vulgar, defamatory, threatening, discriminatory, harassing, abusive, hateful or embarrassing to my workplace, fellow employees or patients through social networking forums.
- I have a duty to maintain the integrity and quality of my job performance.

Doing the Right Thing Means ...

- Not making any sexual advances toward anyone
- Meeting annual training requirements
- Making suggestions that improve professional development or training
- Reporting unethical or inappropriate use of e-mail, the Internet or social networking

ACCOUNTABLE



We carefully and responsibly manage resources along with resources entrusted to us by our customers.

We are supportive of and sensitive to our customers to preserve and enhance community owned hospitals.

Caring is as important as results.

We work to educate, develop knowledge and improve skill level so we can improve operations, satisfaction and patient care through careful and responsible management.

Each employee takes personal ownership for success and accepts responsibility and accountability for his/her actions and work.

Principle 4: Billing & Coding

I am committed to fair and accurate billing that is in accordance with federal and state laws.

- Employees assigned to charging, billing and medical record coding strive to keep work accurate, timely and in compliance with policies and procedures, as well as federal and state laws and regulations.
- I take appropriate steps to correct problems when issues are found with charges, billing, or coding.
- Periodically coding practices and policies are reviewed, including software edits, to ensure they are consistent with federal, state and private payer health care programs.
- Records are regularly reviewed for credit balances and any overpayments are promptly refunded.
- We comply with government regulations regarding patient deductibles and co-insurance amounts.
- General collection/credit procedures are conducted according to the Fair Debt Collection Practices Act.
- Patient and payer billing questions or complaints are responded to in an accurate and timely manner.
- Private insurers and government payers are provided accurate billing information supported by proper medical documentation.

Doing the Right Thing Means ...

- Filing patient care claims only for services rendered and medically necessary
- Billing only for services documented in the medical record
- Never filing a claim that I know is up-coded, exaggerated, misleading or false
- Addressing any possible mistake with my supervisor or another manager
- Initiating corrective actions when an error in claim processing is discovered
- Asking questions if I am unsure about the accuracy of a claim for services
- Maintaining patient confidentiality in accordance with protected health information (PHI) guidelines

COMPETENT



We possess the skills, attitudes and knowledge necessary to achieve desired outcomes and we embrace continuous learning.

Standards of Conduct apply to everyone - employees, physicians, contractors, trustees, volunteers and vendors.

Those who do not follow the Code of Ethics & Conduct will be handled according to policies and bylaws.

Principle 5: Protection and Use of Information, Property and Assets



I am committed to protecting property and information against loss, theft, destruction and misuse. I am committed to protecting the use and disclosure of PHI.

- Patient privacy is honored by not revealing or discussing patient-related information except with health care staff involved in the patient's care, treatment, payment or as authorized to review patient information.
- Business associate agreements are used with agencies or vendors authorized to access patient PHI. Only minimum necessary PHI is accessed to complete work.
- Patients have a right to timely access of their medical records in compliance with federal and state law, regulations and policies.
- Medical and business records are maintained and secured. Organizational safeguards are followed to protect patient information from breach.
- Computers, e-mail, Internet, intranet and social media technology are primarily used for work-related purposes, and will not be offensive, discriminatory or harassing to others. All information sent, received or stored in the e-mail system is the property of the hospital or company.
- It is prohibited to use unauthorized personal software or to make copies of organization software.
- All hospital property and equipment shall be used for its intended purpose. Disposal of property and equipment is performed in accordance with organizational policy.

Doing the Right Thing Means ...

- Observing and protecting the patient's privacy and confidentiality
- Not discussing or using confidential information except as my job requires
- Obtaining written authorization as required to provide PHI
- Never removing or altering patient care information in the medical record
- Entering patient care information at the time of medical care
- Contacting the Privacy & Security Officer(s) about concerns related to privacy or breaches of information systems

COLLABORATIVE



We develop, maintain and strengthen partnerships inside and outside the organization to drive desired outcomes

INNOVATIVE



We are committed to supporting the pursuit of excellence and strive to enhance the quality of healthcare in the communities we serve.

We embrace creativity and encourage innovation in processes, ideas, products and services.

We encourage and support the development of our human resources by providing developmental and learning experiences to our employees.

Principle 6: Conflicts of Interest

I am committed to acting in good faith in all aspects of my work by avoiding the actual or appearance of conflicts between my private interests and my work duties.

- I will report actual or perceived conflicts to a supervisor or management.
- I will not offer, accept or provide gifts or favors, such as meals, transportation or entertainment that might be interpreted as a conflict of interest.
- Board members, senior management, medical directors and other management and key employees will annually disclose any ownership interest and/or other relationships that are or may appear to be in conflict with their responsibilities to the organization.
- A conflict of interest may exist when actions or activities of an individual acting on behalf or with the organization receives improper gain for him/herself or for his or her family member.
- Outside employment is prohibited that conflicts with the ability to carry out the full scope of responsibilities and perform duties at or above expectations.
- Employing or having a business relationship with a relative by your organization must be approved by Human Resources or senior management.
- Relationships with vendors and contractors are unbiased and objective.
- Medical staff members will avoid conflicts of interest related to their medical staff duties. Unavoidable conflicts are to be disclosed and the medical staff member will not participate in discussion, decision or activity connected with the conflict.

Doing the Right Thing Means ...

- Promptly reporting any financial, business or family relationship with a competitor, customer or supplier to my manager or compliance officer
- Obtaining prior written approval from a senior executive before accepting a consulting or other business relationship with a competitor, customer or supplier while employed within your organization
- Not influencing actions or decisions when there is a personal interest
- Not accepting or offering gifts, meals or courtesies that could be viewed as an attempt to gain advantage
- Not making decisions or taking actions that benefit a family member, friend or business associate

TRUSTWORTHY



We are ethical in our practices in order to create a foundation of trust rooted in credibility and fairness.

Understanding potential conflicts of interest is the first step toward avoiding them.

Principle 7: Health & Safety

I am committed to maintaining a work place that protects the health and safety of our patients, employees and customers.

- Strive to comply with all patient and employee safety, environmental safety and health requirements established by management, federal and state laws and other regulatory bodies.
- We strive for our work environment to be free from workplace violence.
- Disposal of medical and hazardous materials are disposed in compliance with policies, federal and state regulations.
- Promptly report to management incidents or accidents that potentially or actually involve an injury to an employee, patient, visitor or physician.
- All employees attend training in health and safety to reduce hazards and for education about safe work practices.
- It is the responsibility of each employee to inspect the work area under his/her control to eliminate or report health and safety risks.
- The manufacture, sale, possession, distribution or use of illegal drugs or alcohol at work is prohibited.

Doing the Right Thing Means ...

- Disposing blood and blood products in correctly labeled receptacles
- Following safety precautions on (Safety Data Sheets) SDSs when handling or disposing of hazardous materials
- Reporting any spills, leaks or unsafe storage of hazardous materials
- Wearing appropriate personal protective equipment while performing work assignments
- Never reporting to work while under the influence of illegal drugs or alcohol or drugs that could impair my ability to perform my duties
- Informing management of potential domestic violence that may impact the workplace
- Not bringing weapons of any kind into the workplace

What Every Employee Should Know



Who is the Compliance Officer?

**Deborah Verret
212-6167**

Who is responsible for the privacy of information?

**William Toon
212- 7624**

Who is responsible for security of electronic and paper information?

**Derek Spangler
212- 7619**

Where can I find policies and procedures that guide compliance?

B-Line

Principle 8: Customer Relations Through Caring

I am committed to following our Core Values and achieving high customer satisfaction.

- Customers include patients, visitors, employees, medical staff, volunteers and outside contacts that present to our facility. We strive to create a clean, efficient and professional environment for our customers.
- Treat everyone with the same dignity and respect that we want for ourselves.
- Maintain courtesy, respect, responsiveness, communication, teamwork and professionalism.

GIFTS define customer relations

- **Greeting-** Introduce yourself, make eye contact, and ask if you can assist customers.
- **Interaction-** Explain your purpose and acknowledge their situation.
- **Finish-** Complete the interaction by asking if there is anything else you can do at that specific moment.
- **Time-** Give an approximate time that you will return, if possible.
- **Surroundings-** Maintain overall cleanliness within work areas.



Communication and Reporting

Report your questions or concerns about an activity being unethical, illegal or wrong.

1. Talk to your supervisor. He or she is most familiar with the policies that relate to your work.
2. If you are not comfortable contacting your supervisor or manager or do not receive an adequate response, talk to another member of the management team or Human Resources.
3. If you followed #1 or #2 and still have questions, contact your Compliance Officer. The Compliance Officer will maintain your confidentiality and work to resolve your issues fairly and without retaliation.
4. If for any reason you feel you cannot follow the above steps, or don't want to give your name, call Baptist Hospitals of Southeast Texas' Corporate Compliance Hotline at 1-844-754-3341. Baptist Hospitals of Southeast Texas's Corporate Compliance Officer will review and address all reports to the Hotline.

Compliance Hotline

Calls to the Compliance Hotline are not traced or recorded and can be anonymous. If you do give your name, your identity will be protected to the extent allowed by law. No disciplinary action or retaliation will be taken against you for calling the Compliance Hotline.

All claims are investigated before any action is taken. The rights of all staff members, including anyone who is the subject of a hotline call, will be respected and protected.

Non-Retaliation Policy

No disciplinary action or retaliation will be taken against you for reporting a perceived issue, problem, concern, or violation "in good faith." If an employee believes that the information being reported is true, then the employee is reporting "in good faith." We value integrity of individuals and the right to be treated fairly and with respect. A Non-Retaliation Policy is available for more detail.

Compliance Hotline



How to report a concern:

- **Any member of management**
- **Human Resources**
- **Compliance Officer**
- **Ethics & Compliance Hotline**
1-844-754-3341

Employee Responsibility

Employees are expected to follow laws, regulations, policies and the Code of Ethics & Conduct in a manner consistent and supportive of organizational mission, vision and values. Anyone who knows about or suspects a violation must report this information. If you do not report a violation, you may be subject to disciplinary action up to and including termination, even if you were not directly involved. Reporting does not protect you from disciplinary action regarding your own performance or conduct, but your honesty will be considered.

Management Responsibility

Executives, Directors, Supervisors and Managers define an organization's management. Management is expected to demonstrate and promote a commitment to ethical and legal behavior consistent with the mission, vision and core values. As a leader, you have the obligation to ensure that employees under your supervision:

- Understand and follow all laws, regulations and policies within the scope of their responsibilities
- Know the procedure for reporting suspected or actual violations
- Create an environment or culture that encourages others to ask questions and report actual or suspected violations

When an employee comes to you with a question regarding compliance, you are responsible to the employee for:

- Discussing with the employee steps you will take to ensure the employee does not fear or experience retaliation
- Maintaining employee confidentiality
- Collecting accurate information regarding the employee's report
- Initiating the process of investigation
- Informing the employee of your follow-through on his or her report

