St. Mary’s Hospital Standards of Business Conduct
–Students

In carrying out our health care ministry in a manner consistent with the Sisters of Charity of Leavenworth Health System’s (“SCL/HSC”) Mission and Core Values, each officer, director, employee, physician, student and agent (“Covered Persons”) of St. Mary’s Hospital and Regional Medical Center (“St. Mary’s”) has a responsibility to adhere to a high standard of individual and organizational ethical and legal business practices.

The Core Values of SCL/HSC: Respect, Excellence, Wholeness, Stewardship, Response to Need, and Good Humor impel us to live an ethical individual and work life. Respect directs us to put cultures of courtesy & consideration for all into place in which honesty, fairness and ethics play an essential role. Excellence invites us to a high degree of quality in all that we do.

This document is a practical extension of SCL/HSC Core Values. It more fully articulates St. Mary’s expectations for how we as students and all other Covered Persons should conduct ourselves to promote and protect the integrity of St. Mary’s.

Much that constitutes ethical business behavior is second nature to people. Yet, sometimes we encounter situations in which we are unsure of what to do or how to act. The Guidelines Regarding Ethical Business Behavior describes St. Mary’s expectations in greater detail. It covers a wide variety of circumstances and situations that individuals may encounter during the course of their duties and serves as a reference for all Covered Persons whenever questions arise regarding appropriate business conduct. The booklet, A Mission Based on Values, describes in detail the confidential ORP hotline which can be used anonymously to report legal and ethical violations at 1-800-843-4359. Copies of both the booklet and the guidelines are available from the Organizational Responsibility Officer upon request.

What does this mean to each of us? It means that St. Mary’s requires its students and other Covered Persons to conduct the business affairs of St. Mary’s in a manner consistent with the following:

- Act honestly and ethically and conduct all activities in compliance with our own policies and procedures as well as the laws and regulations that govern our health care ministry. These laws relate to subjects such as abuse, antitrust, employment discrimination, environmental fraud, false claims, lobbying and political activity, patient privacy, self-referral prohibitions and tax.

- Report our own violations and those of others to the manager, the Organizational Responsibility Officer (“ORO”), Terri Chin (Ext. 2020), the Assistant ORO, Joann Martinez (Ext. 2497) or by using the confidential ORP hotline.

- Disclose debarment and unlawful Federal health care activities. All of us are required to disclose immediately any proposed or actual debarment, exclusion or other event that makes any one of us as an individual or as part of an entity ineligible to participate in Federal health care programs, including Medicare and Medicaid, per Administrative Standard #B-30, Sec. 2. In addition, we must immediately disclose proposed or actual ineligibility for participation in Federal procurement or non-procurement programs and convictions of a criminal offense for incorrect or misleading claims information or payments to physicians with the object of reducing or limiting services provided as explained in more detail at 42 USC Section 1320a-7(a).

- Promote the highest standards of business ethics and integrity. We must represent St. Mary’s accurately and honestly and must not engage in any activity intended to defraud anyone of money, property or services. Further, we will act in good faith and in the best interest of St. Mary’s.

- Maintain the confidentiality of patient health and financial information.

- Protect confidential and proprietary information about employees, medical staff members, St. Mary’s and the organization.

- Conduct activities and relationships with others so as to avoid actual conflicts of interest, in appearance or fact. If we do have conflicts, we must make full disclosure and take appropriate action under applicable Conflicts of Interest policies.
• Conduct business transactions with suppliers, contractors, vendors, pharmaceutical representatives and other third parties at arm's-length and free from offers or solicitation of gifts and favors, or other improper inducements.

• Exercise responsible stewardship to preserve and protect St. Mary's assets by making productive and effective use of resources provided.

• Pay particular attention to any activity that might result in a False Claim. Examples include the accurate and complete documentation of services provided in the medical record as well as careful preparation and submission of accurate claims for payment of those services. (Additional information about the False Claims Act is found in Standard Org.Adm.ORP.010)

As a result of being granted access to Hospital operating system(s) and electronic information, I may have **access to electronic confidential information**. I have read the following standards and understand I am required to comply with them: (1) Org.Adm.HIPAA.022 Sanctions for Violations of HIPAA Privacy &/or Security Standards; (2) Org.Adm.HIPAA.023, Access to Electronic Protected Health Information; and (3) Org.Adm.HIPAA.025, Accessing ePHI with Hospital Workstations and Other Electronic Devices.

I **certify** that I have not been convicted of a criminal offense related to health care or listed by a federal agency as debarred, excluded or otherwise ineligible to participate in a federal health care or procurement program. I further certify that I do not have a controlling interest in any entity that is likewise ineligible.

Failure to comply with the requirements listed or the failure to report such non-compliance subjects both St. Mary's and students as individuals to a range of legal consequences including removal from the student program, monetary penalties from $1,000 to $2,500 per day, from $5,500 to $11,000 per false claim, imprisonment, and, in the worst case, exclusion from participation in Federal health care programs like Medicare and Medicaid.

Date: ___________________________________________ Student number: __________________________

Print name of individual student: ____________________________________________________________

Student signature: ________________________________________________________________________