Code of Conduct

SCL Health
MISSION

We reveal and foster God’s healing love by improving the health of the people and communities we serve, especially those who are poor and vulnerable.

VISION

Inspired by our faith,
We will be distinguished as the trusted person-centered partner to those who engage with us in their physical, mental and spiritual health decisions.

We will share accountability with our clinicians, associates and affiliated stakeholders to deliver exceptional care that is well-coordinated, accessible, affordable, safe, and results in optimal outcomes for individuals and populations.

We will grow as community-based health networks in partnership with others who share our vision and values and align with us to be an essential provider to those we serve.

VALUES

Caring Spirit
We honor the sacred dignity of each person.

Excellence
We set and surpass high standards.

Good Humor
We create joyful and welcoming environments.

Integrity
We do the right thing with openness and pride.

Safety
We deliver care that seeks to eliminate all harm for patients and associates.

Stewardship
We are accountable for the resources entrusted to us.
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RESOURCES:
Compliance Contacts:
The Landing Compliance Contacts Page
HR Service Center:
303-813-5250 or 855-412-3701
PEARL – Safety Occurrence Reporting
Technical Assistance Center – Systems and Technology Service Center:
303-866-8282 or 855-866-8282
Compliance Hotline:
1-877-393-6752 or sc-health.alertline.com
The Purpose of Our Code of Conduct

At SCL Health, we recognize that working in the healthcare industry is a privilege that comes with a great deal of responsibility. Our person-centered philosophy welcomes individuals, their families and other guests to our health system. We focus on providing the highest standard of care aimed at achieving quality outcomes; a safe, supportive environment; and the best possible care experience.

We conduct our work in a highly regulated environment in several states. As we provide healthcare services, we must also meet federal, state and local laws. Even though we exist to provide a healing ministry, we provide this care in a very complex environment. It is important for all of us to remember that our ministry can only exist if we uphold our legal and ethical responsibilities.

This Code of Conduct introduces our associates and partners to the various areas of the laws, rules and ethical standards requiring our focus and understanding. We designed this document to provide an overview of these requirements through standards and examples of behaviors.

We require that you read our Code and become familiar with its contents. Please use this document as your first resource when you have a question or concern. We created this Code to be concise and straightforward. Of course, no code of conduct can cover every possible situation. When your question cannot be fully addressed by this Code, please reach out to additional resources, including related policies, procedures and individuals within our organization who can provide direction.

Who is Covered

The standards presented in this Code apply to all of our health system’s entities and associates. In any instance where business partners, consultants or contractors work with us in providing services, we ask that they be respectful of and comply with those aspects of the Code that pertain to the services they provide to SCL Health. Individuals who supervise our business partners, contractors and consultants are responsible for communicating these standards and for evaluating those aspects of the Code that apply to the services they provide.

OUR RESPONSIBILITIES

Each of us is responsible for acting with integrity. This is at the center of our mission and is especially necessary when we encounter difficult situations. Meeting our ethical and legal responsibilities helps us to put the needs of our patients first. Each of us must:

• Know and obey the law.
• Know and follow the Code of Conduct and applicable policies and procedures.
• Complete required training in a timely manner.
• Keep up-to-date on current standards and expectations.
• Promptly report concerns or possible violations.
• Fully cooperate with investigations.

ADDITIONAL RESPONSIBILITIES FOR LEADERS

We all contribute to the success of SCL Health by abiding by the Code of Conduct. Our leaders model our values and guide their teams in order to meet our ethical, legal and regulatory requirements. They are instrumental in creating an open and welcoming environment where team members are comfortable asking questions and raising concerns. In fulfilling their roles, leaders are called to:

• Create an environment that builds relationships and encourages open communication.
• Serve as a resource to others by illustrating how the Code and policies apply to our daily work.
• Seek opportunities to discuss and address ethically challenging situations.
• Respond quickly and effectively to reported concerns and involve Integrity and Compliance teams as needed.
• Model our seven Leadership Behaviors that include accountability, trust and transparency.
• Maintain a healthy and safe work environment, where no associate feels pressured to do something against the law or in opposition to our ethical standards.
• Guide associates to utilize resources properly and productively.

Ethical and Religious Directives for Catholic Healthcare Services

SCL Health care sites that are sponsored by Leaven Ministries follow the Ethical and Religious Directives for Catholic Healthcare Services (ERDs, 2009). These ERDs provide additional ethical standards and authoritative guidance for conduct and care delivery in Catholic-affiliated institutions.

Making the Right Decision

In our highly regulated industry, the path is not always clear. At times, you may be uncertain of how to act or respond. You are not alone, and we encourage all associates to seek help and guidance as needed. If you have a question or concern, contact our knowledgeable Integrity and Compliance team or other experts within our organization.

How will you know when to ask for help? If your answer to any of the following questions is “no,” or if you are unsure, please stop and seek assistance.

• Is my behavior or action consistent with our Code, policies and procedures?
• Is it the right thing to do in light of our Mission, Vision and Values?
• Does my decision promote integrity and ethical behavior in my workplace?
• Can I say that I would be proud of my choice if our patients, my family members or the public learned about my action or failure to act?
The Integrity and Compliance Program

Our Integrity and Compliance Program provides structure, support and protection to our health system. The program ensures that we can use our assets and resources for the benefit of our patients and communities. Understanding how the elements of our program work gives us confidence in being honest and forthright when it is necessary to address an issue or concern.

Program Structure

STANDARDS AND POLICIES
Our Code of Conduct, policies and procedures provide specific guidance for SCL Health associates. As requirements of employment, we mandate that all associates read and acknowledge this Code, access policies on The Landing and seek other resources described in this Code.

OVERSIGHT
We integrate our Integrity and Compliance Program at all levels of our health system. The SCL Health Board of Directors leads this program and our executives direct its implementation. This includes our health system’s President and CEO, and the Chief Integrity and Compliance Officer. In addition, there are local Compliance and Privacy Officers as well as Compliance Committees. You can find more information, including how to contact the Compliance Officers at each location, on the Compliance page on The Landing.

EDUCATION AND TRAINING
Our Integrity and Compliance Program cannot be successful without education and training. We provide new associates with one hour of compliance training and all associates with training annually. In addition, certain positions, such as billing and coding, require additional training. We provide and track much of this education in our online learning management system.

AUDITING AND MONITORING
We regularly monitor key functions, systems and processes. We report the monitoring results to the compliance committees. If corrective changes are necessary, the Integrity and Compliance department assesses the corrective action and tracks its completion. In addition, the Internal Audit function tests compliance with legal requirements and SCL Health policies. We report these activities through the SCL Health Board of Directors Audit, Organizational Integrity and Compliance Committee.

REPORTING
It is the obligation of all associates to report fraud, misconduct and noncompliance. The Integrity and Compliance Program provides many ways for associates to report concerns without fear of retaliation, including an anonymous Compliance Hotline.

INTERNAL INVESTIGATION OF REPORTS
All associates must report any identified compliance issues. Reported issues are investigated, reviewed and resolved in a way that is timely and appropriate. If necessary, corrective action is implemented to ensure that the failures do not continue. When required, we make disclosures and give reports to government agencies. Each of us is expected to cooperate with investigation efforts.

As part of our Integrity and Compliance Program, we provide a Compliance Hotline at 1-877-393-6752 or sclhealth.alertline.com
ENFORCEMENT AND DISCIPLINE

SCL Health takes violations of the law, regulations and the Code very seriously. We investigate each reported potential violation by reviewing the facts and circumstances, and apply appropriate discipline based on the results of the review. Disciplinary actions include verbal or written corrective/disciplinary action, up to and including involuntary separation from employment. The level of discipline depends on the nature, severity and frequency of the violation.

Reporting, Confidentiality and Non-Retaliation

Associates have many avenues for seeking guidance or reporting concerns. We encourage resolution at the local level relating to human resource issues, such as concerns about payroll, personality disputes or disagreements with supervisors. It is also appropriate and encouraged that you bring compliance-related concerns to the attention of your supervisor or other manager at the site first. If you are not comfortable reporting to your supervisor, or it is not appropriate to do so, you may report your concerns to a human resource manager, the local Compliance and Privacy Officer or another member of local management.

You can also report concerns through the Compliance Hotline at 1-877-393-6752 or sclhealth.alertline.com. Please report your concerns in a timely manner so we can consider and investigate any issues.

SCL Health makes every effort to keep a reporter’s identity confidential when the individual wishes to remain anonymous. We do not tolerate retaliatory behavior or disciplinary action against an individual who has reported a concern or suspected violation in good faith. Certain federal and state laws, including the federal False Claims Act, protect those who speak up in good faith from retaliation. Anyone who deliberately makes a false accusation in order to harm or retaliate against a co-worker is subject to discipline.

SCL Health associates should always strive to live the SCL Health Mission, Vision and Values and encourage everyone to seek guidance or report any concerns.
Quality of Care and Patient Safety

At SCL Health, we understand that our patients are unique individuals and we serve with a caring spirit honoring the sacred dignity of each person. We provide person-centered care in a safe, effective and efficient manner. To encourage this effort, our clinical quality improvement team builds and designs systems and processes incorporating best practices in caring for patients. The team uses high-reliability organization (HRO) principles and strives to deliver harm-free patient care.

• We follow up with patients and other caregivers to create a safe environment and improve communication.
• We use checklists to remind us to complete steps in a process before moving forward.
• We encourage anyone on any team to stop a process if he or she thinks it is incorrect.
• We maintain standards for licenses and credentials for caregivers who work in all locations.
• We report unanticipated outcomes to a supervisor and prepare for appropriate follow-up and communication with the patient and family.

We are dedicated to improving the health of the people and communities we serve, especially those who are poor and vulnerable. This is why we exist!

What’s the Right Thing to Do?
As I am walking down the hall, I notice an empty bed parked in front of an oxygen shutoff valve. At the nursing station, I locate an associate from that patient care area who moves the empty bed to another location.

I’m doing the right thing when:
• I address patient safety needs and issues.
• I keep all pathways clear, as directed by The Joint Commission.
Patient Rights

While patients are in our care, we are committed to informing them of their rights and to protecting their rights. We deliver high-quality, person-centered care when we respect and support patients and their loved ones and give them information to make decisions regarding the care they are offered.

- We provide each patient with a written statement of patient rights and a notice of privacy practices.
- We seek to involve patients in all aspects of their care.
- We provide kind and respectful care no matter a patient’s personal values and beliefs, age, sex, race, color, religion, disability, national origin, ability to pay, or any other category protected by state or federal law.
- We seek to resolve patient complaints promptly and to provide contact information so patients can report grievances.
- We provide patients with information regarding advance directives and other health-planning measures.

Our vision of person-centered care plays out in our promise to provide patients and their loved ones the best experience through genuine, compassionate and personalized care at each of our service locations.

What’s the Right Thing to Do?

Even as I conduct a relatively routine procedure, such as an IV insertion, I am conscious of the patient. I explain my actions and give information about the purpose of the IV, including about the medicine to be administered and leave time to address the patient’s concerns.

I’m doing the right thing when:

- I explain the purpose of the treatment being provided.
- I educate the patient on the medications that are being administered.
- When asked, I explain the registration and billing process to the patient.

LEARN MORE:

Find more on the Quality and Safety page on The Landing, including:
- The Joint Commission standards.
- Centers for Medicare and Medicaid Services.
- Office for Civil Rights.
Emergency Medical Treatment and Labor Act (EMTALA)

We are committed to understanding and following the requirements under the Emergency Medical Treatment and Labor Act. We provide patients seeking emergency medical treatment and women experiencing labor with a medical screening examination and necessary stabilizing treatment, regardless of their ability to pay.

- We have specialists and subspecialists on call to the Emergency Department able to respond to patients.
- We do not delay a medical screening for a patient in order to obtain financial and demographic information.
- We will not transfer a patient when we have the capability and capacity to treat the patient, unless such transfer is at the patient’s request.
- We have appropriate transfer protocols in place with other hospitals if we are not able to meet the medical needs of the patient.

Confidentiality of Patient Information

The information we create, use and disclose while taking care of our patients is sensitive and personal, and we are committed to keeping all patient information protected and secure. We receive training to understand the various requirements SCL Health must meet to comply with HIPAA and to protect our patients’ information.

- We only discuss patients and their care with authorized persons in appropriate places and with low voices.
- We verify the identity of the person requesting a copy of a patient record and require a completed authorization to release information.
- We access only the appropriate amount of patient information we need to do our jobs.
- We provide individuals with timely access to their healthcare information.
- We provide patients with our Notice of Privacy Practices.
- We hold business partners to the same standards when they conduct business on our behalf.
- We never take pictures or videos of patients or their families, other than for treatment purposes or with written authorization of the patient.
- We do not post or discuss patient information on social media sites (except via Marketing and Communications, with written patient consent).

I’m doing the right thing when:
- I send the patient’s information with the EMTs when a patient transfers to another facility.
- The transfer form is filled out accurately and completely when transferring a patient.

LEARN MORE:
Contact information for local Compliance and Privacy Officers is on the Compliance page on The Landing.

What’s the Right Thing to Do?

Visitors are with a patient when I enter the room to conduct a patient evaluation, history and physical. To maintain privacy, I tell them I need time alone with the patient and suggest they go for a snack or refreshment in the cafeteria, giving them directions if needed.

I’m doing the right thing when:
- I protect my patient’s health information and right to privacy and do not disclose any patient information through social media.
- I don’t access patient information from the computer or medical record for personal reasons — for friends, family or myself.

LEARN MORE:
Find more on the Compliance page on The Landing.
- Notice of Privacy Practices.
- Contact information for local Compliance and Privacy Officers and the SCL Health System HIPAA Privacy and Security Officer.
- Policies and procedures can be found in PolicyTech accessed on The Landing.
Patients Who are Subjects in Clinical Research

We are committed to protecting the rights and welfare of all individuals who participate in research as human subjects. We expect investigators conducting human-subject research to ensure an effective informed consent process. Obtaining consent involves informing the subject about his or her rights, the purpose of the study, the procedures to be undertaken, and the potential risks and benefits of participation. When we engage in clinical research:

• We require that all human-subject research comply with human-research protection requirements mandated by federal regulatory agencies, state laws and SCL Health policies.
• We do not tolerate research misconduct.
• We require an Institutional Review Board to review and approve all research activities that meet the definition of human-subject research and follow SCL Health policy and procedures for conducting research in an SCL Health facility or clinic.
• We require costs associated with clinical studies to be billed appropriately and in compliance with relevant laws, regulations, contractual obligations and SCL Health policies.

Clinical Ethics Consultations, Advance Care Planning and Healthcare Decisions

We are committed to maintaining a comprehensive, integrated ethics program. To do so, we focus on the ethical delivery of patient care and emphasize human dignity, mutual respect and mutual trust. We work with patients and their loved ones to understand their wishes, advance directives or other advance care planning measures that will guide or limit treatment decisions.

• We follow a Proactive Integrative Ethics model to ensure the ethical delivery of patient care services.
• We have ethics committees that patients, families and caregivers can access in order to work through difficult ethical concerns.
• We comply with the Federal Patient Self-Determination Act and inform patients that they have the right to an advance directive.
• We ask for, accept and respect advance directives and resuscitative measures.
• We help patients and their loved ones obtain advance care planning resources when requested.
• We honor patient wishes unless they are contrary to Catholic moral teaching, in which case we will assist in the transfer of the patient.

What’s the Right Thing to Do?

I strive to perform patient care services with mutual respect and trust. I work with patients and their family members to assist with their treatment decisions in an ethical manner.

I’m doing the right thing when:

• I ask the patient if he or she has an advance directive upon registration.
• I provide additional resources if the patient requests information about advance directives.
• I am aware of how to access the Care Site Clinical Ethics Committee.

LEARN MORE:

Find more details on The Landing, including information on how to ask for an ethics consult, by visiting each care site’s Patient Services page.
Respect and Diversity

We are committed to creating a joyful and welcoming environment; it is an important part of who we are. We recognize that we come from different backgrounds, cultures, ethnicities and beliefs. There is richness in diversity, and we embrace inclusiveness. When we respect each other and our patients, we live our value of Caring Spirit: honoring the sacred dignity of each person.

• We celebrate and recognize how cultural differences strengthen our health system.
• We support a culture of appreciation and respect.
• We are committed to an environment of associate empowerment.
• We recognize that an open, positive environment enhances productivity and innovation.
• We encourage spirituality in our work spaces through the use of prayer, reflection and ritual.
• We regard laws, regulations and policies relating to diversity as a minimum standard.

Social Media

SCL Health believes social media activity should be viewed as any other form of public communication. Associates are required to apply all pertinent existing SCL Health policies to social media venues.

• We always make work a priority. Blogging and social networking should not interfere with work; such activity is subject to manager approval.
• We do not post any patient information on any social media platform, including images.
Health and Safety/Substance Abuse

We are committed to providing the resources, protocols and practices to create a safe and healthy work environment, free of alcohol and drugs. SCL Health provides safeguards — including policies, training and equipment — to give associates the opportunity to take action and responsibility for their own health and safety.

- We provide training for all associates.
- We require reporting of any workplace injury or illness.
- We encourage associates to seek advice from their supervisor or safety coach if they have questions or concerns and to follow their local safety plan when emergencies arise.
- We require associates to know and understand safety policies and procedures.
- We take immediate action when we suspect an individual reports to work under the influence of drugs or alcohol; this may include drug testing of individuals.
- We prohibit the use of any drug which is illegal under state or federal law.
- We require associates to consult with a supervisor to the extent of their use of prescription or over-the-counter drugs which may interfere with their performance at work.
- We require associates to report any individual who appears to be impaired in the performance of his or her job.
- We embrace and promote associate wellness.

Harassment and Workplace Violence

We are committed to providing a work environment free of harassment and discrimination. We respect and protect the rights of associates to work in a safe, secure, trusting and caring environment.

- We do not tolerate harassment, including degrading or humiliating jokes, slurs or intimidation, based on any characteristic protected by state or federal law.
- We do not allow conduct that is abusive, demeaning, threatening, disrespectful or violent.
- We prohibit sexual harassment, including unwelcome sexual advances, and off-color comments.
- We provide various reporting channels — including the Human Resources Department, Care Site Compliance and Privacy Officers, Compliance Hotline — for associates to report harassment, violence or other misconduct.

Use of SCL Health Resources and Environmental Stewardship

We embrace our value of Stewardship, which means we are committed to protecting the resources entrusted to us. We strive to take care of the environment and natural resources.

- We use technology and electronic communication systems primarily for the benefit of SCL Health and are careful that any personal use does not harm these systems.
- We do not use SCL Health resources for personal gain or the benefit of another individual or company.
- We adhere to all requirements for the proper handling of hazardous materials.
- We report immediately to a supervisor any discharge of a hazardous substance, improper disposal of hazardous or medical waste, or any situation in the workplace that is potentially damaging to the environment.
Conflicts of Interest

Upholding the value of Integrity means we do the right thing with openness and pride. We are committed to acting with integrity and identifying, disclosing and managing or eliminating conflicts of interest. A conflict of interest may arise when an SCL Health associate or partner takes actions for personal gain or has outside interests making it difficult to perform his or her work objectively and effectively. Conflicts of interest also arise when individuals receive special benefits because of their positions in the organization.

- We require certain individuals (e.g., managers, directors, executives, physician leaders and board members) to complete a conflict of interest disclosure upon hire and on an annual basis.
- We require all associates and business partners to report any outside activity or private interest that may be perceived as a conflict of interest and to obtain approval of the supervisor and the local Compliance and Privacy Officer.

Gifts and Entertainment

We are committed to conducting our work in a way that avoids even the appearance of impropriety. We do not give or accept gifts or entertainment to or from a business partner if any purpose is to influence a business decision. Gifts and entertainment exchanged between us and our business partners must comply with the limits set forth in SCL Health policies.

- We never accept gifts of cash from a patient or business partner.
- We check with our business partner on their company’s limits before offering a gift or entertainment.
- We seek legal guidance prior to giving a gift or meal to a government employee, and we refrain from interacting with government officials in any way that could be considered as a bribe or gaining favor with government officials.
- We seek guidance from our supervisor or the Integrity and Compliance team prior to giving anything of value to a patient.

NOTE: These limits do not govern gifts between associates (employees of SCL Health). Associates should not feel compelled to give gifts or other contributions. Gifts exchanged between associates should not ever be given with the intent of influencing a decision.

LEARN MORE:
Find more on the Compliance page on The Landing, including:
- Conflict of Interest Policy.
- Contact information for:
  - Local Compliance and Privacy Officers.
  - Chief Integrity and Compliance Officer.

What’s the Right Thing to Do?

When I am invited to join a business dinner or event, I review our policy. If I have questions, I speak with my manager or call the Care Site Compliance and Privacy Officer.

I’m doing the right thing when:

I pay my own way when I know an event is not in accordance with the policy.

LEARN MORE:
Read more on the Compliance page on The Landing, including:
- Gift Policy.
- Entertainment Policy.
- Contact information for local Compliance and Privacy Officers.
License, Certification and Excluded Persons

Our value of Excellence — setting and surpassing high standards — guides the requirements we set for our associates. We are committed to ensuring that only individuals who are eligible to participate in federal healthcare programs work at our facilities. We ensure that care providers have valid licensure, certification, registration or other credentials. Associates bear responsibility for maintaining the current status of their credentials and providing evidence to SCL Health in a timely manner. Individuals who do not have valid, current licenses are not allowed to perform work that requires a valid license or certification.

- We each take responsibility to ensure that our license or certification is current.
- We report to our supervisor and to our local Compliance and Privacy Officer immediately if we discover a lapse in licensure or credentials. Upon discovery, the associate with improper credentials stops working immediately.
- We institute protocols to verify that all individuals working in our facilities are eligible to participate in federal programs.
- We require all associates and business partners to disclose immediately if they are excluded from Medicare or Medicaid.
- We follow Primary Source Verification standards.

Political Activities

We are committed to protecting our tax-exempt status by not allowing use of SCL Health assets — including associate work time — for lobbying or other political activities. In certain situations, SCL Health may be involved in political activities in accordance with federal and state laws. It is important to distinguish between personal and work-related activities in order to comply with lobbying and other regulations.

- We do not use organizational resources, including email, to personally engage in political activity.
- We participate in political activities outside of work according to personal preferences, and we do so on our own time and at our own expense.
- We do not give the appearance or impression that our political activities represent SCL Health in any way.
- We do not contribute SCL Health financial resources to any political activity or seek reimbursement from SCL Health for any political donations.

I’m doing the right thing when:

I track the expiration date of my nursing or other professional license and take action to see that I renew it on time.

I avoid campaigning at work or during work time for any political initiative.
Our business focus is to deliver on SCL Health’s strategic priorities and key initiatives that will enable our health system to improve the health of our communities with special considerations for those who are poor and vulnerable. Our Mission, Vision and Values are at the heart of our business decisions as we adapt to the changes in healthcare and redesign our person-centered care-delivery model.

We are humbled to be a trusted health partner in a complex industry and are committed to operating with integrity in a way that meets all legal and regulatory standards.

Our legal obligations include complying with federal and state laws specific to healthcare. Common examples of these include fraud and abuse laws, such as the False Claims Act, the Anti-Kickback Statute, the Physician Self-Referral Law ("Stark") and others. This code provides examples of behavior that comply with the laws and, in some instances, refer to a specific law.

### Relationships with Referral Sources

We are committed to creating arrangements with physicians and other referral sources that follow federal and state laws. It is important that associates who interact with physicians and other referral sources are aware of the related laws, regulations and policies that govern these relationships — including the Stark Law and the Anti-Kickback Statute.

- We provide regular training on the Stark Law and the Anti-Kickback Statute to associates involved in arranging and preparing contracts, and making payments for services provided by physicians and other referral sources.
- We review physician agreements with Legal Counsel prior to execution.
- We utilize resources, including legal counsel, to assist in structuring arrangements with potential referral sources in accordance with applicable laws.
- We are committed to board-level oversight of physician compensation arrangements.
- We implement controls and processes to verify that payments to physicians are for services actually performed under a valid agreement.
- We do not pay or accept payment for referrals.

### Documentation, Coding and Billing for Services

We are committed to providing accurate and complete medical record documentation to support our coding and billing process. We strive to be fair, accurate and timely with our billing processes and to follow all related laws, regulations and SCL Health policies. To do this, it is essential to maintain high standards in our documentation processes. It is important that all individuals who edit or update medical records — electronic and paper — provide complete and accurate information and do not destroy information that is part of the official record. Additionally, all medical record documentation is maintained to follow federal and state law requirements.

- We follow processes, policies and procedures to facilitate accurate billing to government payers, commercial insurance and patients.
- We require clinicians to accurately and timely document in a patient’s medical record and bill only for services provided and documented in the patient’s medical record.
- We prohibit any associate or billing agent of SCL Health from filing a claim for payment that is false or fraudulent.
• We provide coding and documentation feedback and education to SCL Health clinicians as part of a professional coding audit program.
• We require coding and billing personnel to have annual job-related education and training.
• We communicate about the ways associates and business partners can report potential violations of laws, including the False Claims Act and similar state laws.
• We provide a clinical documentation improvement program (CDI) by working with physician champions to improve medical record documentation.
• We use systematic methods for analyzing payments we receive to identify and refund potential overpayments in a timely manner.
• We provide financial assistance for those who qualify as we support our mission of serving those in need, especially those who are poor and vulnerable.

Data (Data Integrity and Analytics)
We are committed to data integrity and quality. SCL Health’s decisions are dependent on timely, accurate and complete data. All SCL Health data is considered a protected organizational asset.
• We strictly adhere to organization policies as well as government regulations to protect our assets, our associates and our patients in regard to all access, sharing and usage of data.
• We regard ourselves as stewards of the data we touch.
• We are mindful of accuracy and context when creating data as part of our work.
• We are always aware of data confidentiality, keeping in mind with whom data may be shared and how data should be protected.
• We report concerns regarding inconsistent or inaccurate data to the appropriate person.

Cost Reports, Financial Reporting and Records
We are committed to maintaining and reporting accurate and complete financial information, including operating costs and statistics, and we follow federal and state laws regarding financial reports.
• We review cost reports prior to filing with the federal healthcare program for accuracy, completeness and to double-check we are following the laws, regulations and SCL Health policies and procedures.
• We comply with cost-reporting rules and guidelines that define what costs are allowed and outline the appropriate methods to claim reimbursement for the cost of services provided to program beneficiaries.
• We practice generally accepted accounting principles in documenting, maintaining and reporting financial information and transactions.
• We file in a timely manner IRS documents, including Form 990, and make information publicly available.
• We provide reporting channels for anyone who has concerns regarding questionable accounting or auditing practices and immediately report any such issues to the Board of Directors’ Audit, Organizational Integrity and Compliance Committee.

What’s the Right Thing to Do?
As a clinician, I take time with entries into medical records so that my documentation is accurate and detailed, and supports the services provided.

I’m doing the right thing when:
• I accurately document all intravenous medications that I give to my patients.
• As a clinician, I am accurate and detailed when I charge a patient for a provided service.

LEARN MORE:
Visit PolicyTech on The Landing to learn more about policies on:
• Electronically Storing and Sharing Confidential Information
• Classification of Electronic Information
• Information Asset Acceptable Use

LEARN MORE:
Visit the Finance page on The Landing.
Open and Fair Competition and Marketing Practices

We are committed to presenting truthful, informative and clear information in our marketing, advertising and educational materials. We require compliance with antitrust and other laws governing competitive activities.

- We do not discuss with competitors certain sensitive business information, such as prices charged for goods and services, costs of goods and services, or managed care terms.
- We recognize the highly complex nature of the antitrust laws and consult with supervisors and Legal Counsel regarding competitive activities and appropriate communications.
- We present information about our services in a way that does not intentionally speak badly of other persons or businesses.
- We analyze marketing materials to be sure they include related information about quality and safety components.

Confidential Information

We are committed to keeping electronic and other sensitive information confidential, protected and secure. In the normal course of business, we generate and receive sensitive information to do our jobs, including patient, financial, employment and operational information. Legal and ethical standards require us to keep certain information confidential.

- We encrypt sensitive information when emailing outside of the network or when storing information on removable media such as a USB drive or CD.
- We share confidential business information only with those who need to know.
- We use strong passwords and do not share passwords.
- We maintain a secure environment for credit card information in our control.
- We do not share pricing or cost data with those outside our organization except for sharing pricing with patients as it pertains to their care.

What’s the Right Thing to Do?

When marketing a service or service line, we review our language and materials so that we present information fairly and accurately.

I’m doing the right thing when:

- I do not speak badly of the competitor.
- I present the information in an honest and truthful way.
- I review all information about preventive services so that quality and safety are given priority.

What’s the Right Thing to Do?

I’ve taken a job with another healthcare company and will be leaving my position at the end of the month.

Even after leaving, I understand I am still responsible for maintaining confidentiality for information that I viewed, received or used during employment or while under contract with SCL Health. I leave behind any existing copies of confidential information.

I’m doing the right thing when:

I do not share my login and password with anyone, including co-workers who ask for help in accessing patient information.

LEARN MORE:

Learn more on the Systems and Technology Service Center (STSC) page on The Landing.

- Best practices in Information Security, including use of passwords and encryption.
- Contact information for your local Information Security Officer or the SCL Health Information Security Officer.
Community Health Improvement and Community Benefit

We are committed to supporting our communities, especially the poor and vulnerable.

- We conduct a Community Health Needs Assessment (CHNA) every three years and develop an implementation Plan (CHIP) on an annual basis to address the identified needs.
- We integrate our Community Health Improvement Plan with clinical operations, community engagement, financial services, communications, foundations and mission services to advance the success and awareness of the plan across the organization.
- We link our Community Health Improvement Plan to critical operational strategies such as population health management, evidence-based outcomes, palliative care and medical homes as well as our safety-net clinics.
- We effectively communicate financial assistance policies and community benefit performance, including posting them on our websites.
- We are committed to our mission, and to serving the uninsured and underinsured patient.
- We ensure our Board of Directors’ involvement in meeting our charitable mission and protecting our tax-exempt status.

We encourage associates to consider our shared Mission, Vision and Values in every decision, every day, as we care for our patients, their families and each other.