

Code of Conduct – for Medical Staff

As a member of the medical staff of Diley Ridge Medical Center, you serve as a trusted partner in the delivery of health care services to our patients and community. The Trinity Health Mission Statement calls us to serve together in the spirit of the Gospel as a compassionate and transforming healing presence within our communities. Guided by our Core Values, we are committed to the delivery of people-centered care that leads to better health care, improved health outcomes and overall lower costs for our patients, residents, members and communities we serve.

Trinity Health has established a system-wide Integrity and Compliance Program to support all who work in our health care ministry in understanding and following the laws, regulations, professional standards, and ethical commitments that apply. The Trinity Health Code of Conduct describes behaviors and actions expected of all who work in Trinity Health – colleagues, physicians, suppliers, board members and others. This brochure describes those areas of the Code of Conduct that have particular application to our relationship with you as a member of Mount Carmel's medical staff. If you have any questions regarding this information, please contact your Medical Staff Office or your Integrity & Compliance Officer (ICO) using the contact information provided on p. 2. The complete Code of Conduct is available online at <http://insight.co.trinity-health.org/icp>.

The following standards are expected of all clinical professionals who work in Trinity Health, including members of the Diley Ridge Medical Center medical staff:

Professionalism

- Deliver people-centered, quality health care services with compassion, dignity and respect for each individual.
- Deliver services without regard to race, color, religion, gender, sexual orientation, marital status, national origin, citizenship, age, disability, genetic information, payer source, ability to pay, or any other characteristic protected by law.
- Maintain a positive and courteous customer service oriented attitude towards patients, their families, co-workers and others.
- Demonstrate the highest levels of ethical and professional conduct at all times and under all circumstances.
- Speak professionally and respectfully to those you serve who, in turn, should speak professionally and respectfully to you.

- Respond to requests for information or assistance in a timely and supportive manner.
- Behave in a manner that enhances a spirit of cooperation, mutual respect and trust among all members of the team
- Report disrespectful behavior including rude, embarrassing, belittling, berating, threatening, intimidating, and/or insulting, or the use of loud, profane and abusive language to your Medical Staff Office or one of the other resources listed on page 2.
- Commit to working with others in a supportive team environment.
- Deliver services in accordance with all professional standards that apply to your position.
- Create and maintain complete, timely and accurate medical records consistent with medical staff bylaws.
- Protect the privacy and confidentiality of all personal health information - electronic, paper or verbal - you may receive.
- Maintain appropriate licenses, certifications and other credentials required of your position.
- Abstain from inappropriate physical contact with others and report any harassment, intimidation or violence of any kind that you witness.
- Maintain a safe work environment by performing your duties and responsibilities free from the influence of drugs or alcohol.
- Protect the confidentiality of all medical peer review information.

Commitment to Providing Quality Care that is Safe and Medically Appropriate

- Commit to safety: every patient, every time.
- Speak up when you see a quality or safety issue and discuss mistakes you see with others so we can learn how to prevent future mistakes.
- Adhere to clinical guidelines and protocols that reflect evidence-based medicine.
- Actively engage and support efforts to improve quality of care, including organization-approved technology advancements.
- Actively participate in initiatives to improve care coordination between and among caregivers, community support agencies and other providers.
- Actively participate in initiatives to improve the health of the community as a whole.

Advocating for Our Patient's Needs

- Provide comfort for our patients, including prompt and effective response to their needs.
- Communicate clinical information to patients and their designees in a clear and timely manner.
- Discuss available treatment options openly with patients, or their designees, and involve them in decisions regarding their care.

- Provide care to all patients who arrive at your facility in an emergency, as defined by law, regardless of their ability to pay or source of payment.
- Clearly explain the outcome of any treatment or procedure to patients, or their designees, especially when outcomes differ significantly from expected results.
- Respect patient advance directives.
- Address ethical conflicts that may arise in patient care, including end-of-life issues, by consulting Mount Carmel's system ethicist in Mission Services.
- Provide care that is consistent with the Ethical and Religious Directives for Catholic Health Care Services.

Stewardship of Resources

- Properly use and protect all resources including materials and supplies, equipment, staff time and financial assets.
- Respect the environment and follow your organization's policies for the handling and disposal of hazardous materials and infectious waste.
- Operate in a manner consistent with Mount Carmel's charitable purpose. Tax regulations prohibit the improper use of Diley Ridge Medical Center assets to benefit individuals, including Medical Staff members who are in a position to exercise significant influence over the business activities of the organization.

Corporate Citizenship

- Act with honesty and integrity in all activities.
- Actively participate in training programs offered by Mount Carmel.
- Follow Mount Carmel's policies requiring the disclosure of outside activities or relationships that could represent a conflict of interest with your medical staff role and any other responsibilities.
- Follow all requirements of Medicare, Medicaid, other federal and state health care programs, as well as those of commercial insurance companies and other third-party payers. These requirements generally involve:
 - Delivering high-quality, medically necessary and appropriate services.
 - Creating and maintaining complete and accurate medical records.
 - Submitting complete and accurate claims for services provided.
 - Protecting the privacy and security of health information we collect.
- Conduct all medical research activities consistent with the highest standards of ethics and integrity and in accordance with all federal and state laws and regulations, and Mount Carmel's Institutional Review Board policies.
- Be aware that the offer or exchange of money, goods, or any other thing of value in return for the

referral of patients is strictly prohibited by federal and state laws and by Diley Ridge

- ~~Medical~~ policies.

Immediately notify your Medical Staff Office if notified you have been excluded or debarred from participation in federal or state healthcare programs. Diley Ridge Medical Center is prohibited from submitting any claim for services ordered, prescribed or provided by individuals or organizations excluded from participation in federal health care programs.

Where to Find Help

If you have a question or concern about possible violations of law, regulation or the Code of Conduct you are encouraged to seek answers by contacting one of the following resources:

- Your Vice President of Medical Affairs or Medical Staff Office
- Another member of Mount Carmel's senior management team
- Your Integrity & Compliance Officer at 614-546-4294 or IntegrityOfficer@mchs.com
- The Trinity Health Integrity and Compliance Line at 1-866-477-4661 or you may file a written report online at www.mycompliancereport.com using access code "THO."

Thank You!

We appreciate your taking time to review this information and your commitment to carrying out the Mission of Diley Ridge Medical Center with the highest standards of ethical behavior. Your dedication and support is critical to this important effort.

Cheryl Piatka

Integrity and Compliance Officer
546-4294

Christie Santa-Emma

Privacy Officer
546-3284

Tom Enneking

Information Security Officer
546-3668

I will walk ^{But as for me,} in my integrity

- Psalm 26:11

ADDENDUM

The False Claims Act

As a recipient of federal health care program funds, including Medicare and Medicaid, Diley Ridge Medical Center is required by law to include in its policies and provide to all associates, agents and contractors, detailed information regarding the federal False Claims Act and applicable state civil and criminal 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 regarding any federal health care program, which includes any plan or program that provides health benefits, whether directly, through insurance, or otherwise, which is funded directly, in whole or in part, by the United States government or any state health care program. "Knowingly" includes having actual knowledge that a claim is false or acting with "reckless disregard" as to whether a claim is false. Examples of potential false claims include knowingly billing Medicare for services that were not provided, submitting inaccurate or misleading claims for actual services provided, or making false statements to obtain payment for services.

The False Claims Act contains provisions that allow individuals with original information concerning fraud involving government health care programs to file a lawsuit on behalf of the government and, if the lawsuit is successful, to receive a portion of recoveries received by the government.

State Laws

In most states it is a crime to obtain something (e.g., such as a Medicaid payment or benefit) based on false information. In addition to the federal law, several states in which Trinity Health operates (California, Indiana and Michigan) 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.

Penalties for Violating the False Claims Act

There are significant penalties for violating the federal False Claims Act. Financial penalties to an organization that submits a false claim can total as much as three times the amount of the claim plus fines of \$5,500 - \$11,000 per claim. In addition to fines and penalties, the courts can impose criminal penalties against individuals and organizations for willful violations of the False Claims Act. The false claims laws adopted in the states of California, Indiana and Michigan also carry significant fines and penalties of \$5,000 - \$10,000 per claim.

Protections Under the False Claims Act

The federal False Claims Act protects anyone who files a lawsuit under the Act from being fired, demoted, threatened or harassed by his or her employer as a result of filing a False Claims Act lawsuit. Similar protections are also provided to individuals under the state False Claims Act laws adopted in California, Indiana and Michigan. Ohio also has specific laws providing protections.

Our Commitment to Integrity

Diley Ridge Medical Center is committed to fully complying with all laws and regulations that apply to our health care ministry. We have established the Integrity and Compliance Program (ICP) as evidence of our commitment to operating with the highest degree of integrity. The ICP includes the Code of Conduct, policies and procedures, training and education, auditing and monitoring, and mechanisms for individuals to raise issues and concerns without fear of retaliation. Whether you are a colleague, contract worker, volunteer, medical staff member, vendor or other business partner with Trinity Health and/or Diley Ridge Medical Center, **you are reminded to:**

- Act with honesty and integrity in all of your business activities
- Follow all laws and regulations that apply to your work activities, including requirements of Medicare, Medicaid and other federal health care programs. These requirements generally include maintaining complete and accurate medical records, and submitting only complete and accurate claims for services provided
- Contact one of the following resources available within Trinity Health or Diley Ridge Medical Center if you have knowledge or concern regarding a potential false claim:
 - The Integrity and Compliance Officer: 614-546-4294
 - The Trinity Integrity Line: 1-866-477-4661. The Integrity Line is staffed 24 hours a day, seven days a week by an outside organization. You may choose to remain anonymous when filing a report.
- You may also file a report online at www.mycompliancereport.com. When prompted for an access ID, please use **THO**.

Trinity Health and Diley Ridge Medical Center policies strictly prohibit retaliation, in any form, against an individual reporting an issue or concern in good faith. Retaliation is subject to discipline, up to and including dismissal from employment or termination of the business relationship with Trinity Health and/or Diley Ridge Medical Center.

Thank you for your commitment to operating with integrity and the highest standards of ethical behavior.