

EJGH

East Jefferson General Hospital

STANDARDS OF CONDUCT

INTRODUCTION TO THE STANDARDS OF CONDUCT

The Standards of Conduct are designed to help us achieve the mission of East Jefferson General Hospital and to provide broad guidelines for all of us to follow in the performance of daily activities. This booklet is an important document. **WE ALL ARE EXPECTED TO READ IT AND COMPLY WITH ALL OF ITS PROVISIONS.**

If you have any questions about the Standards or any of the East Jefferson General Hospital policies or practices, please feel free to raise your concerns with an individual at any level of management or with Human Resources *confidentially and* without fear of retaliation or reprisal. If the concern cannot be resolved through these established channels, or if you feel uncomfortable with the chain of command, you should report the matter to the Compliance Officer. East Jefferson General Hospital has set up a toll-free Hotline for this purpose. Callers to the Hotline may remain anonymous and confidentiality is guaranteed to the limit of the law. Again, there will be no retaliation or retribution against any team member for reporting a concern to management, Human Resources or the Hotline.

East Jefferson General Hospital and all team members have a duty to perform in a manner that reflects the highest ethical standards and a commitment to adhere to all applicable laws and regulations. Also, you are expected to report any concerns that you may have concerning any violation of any statute, regulation, or guideline applicable to state or federal health care programs or with the hospital's policies and procedures.

East Jefferson General Hospital is committed to all requirements and provisions of the Standards of Conduct. Failure of the hospital to abide by the Standards of Conduct and/or any government requirement could result in a substantial penalty, fine or possible federal program exclusion.

The standards contained in these Standards of Conduct are important, and therefore any violation will subject the offender to some form of discipline. The failure to report suspected improper activity may also constitute a violation. Possible disciplinary measures may range from a warning to termination. In addition, referral of the matter may be made to the appropriate government agencies. The team member may also be responsible in a civil suit for losses or other damages caused by his or her conduct. These Standards are intended to clearly state our expectations of team member conduct in order to minimize any such consequences.

Together we shall work to build a system that provides quality services while maintaining our integrity and the high ethical standards of our hospital. Thank you for your cooperation in this very important matter.

Mission Statement

East Jefferson General Hospital, community-owned, provides the highest quality, compassionate healthcare to the people we serve.

Vision Statement

East Jefferson General Hospital will be the region's healthcare leader providing the highest quality care through innovation and collaboration with our team members, medical staff, and community.

Our Values

Quality

- We commit to quality in everything that we do, through achievement and innovation, always contributing to excellent care and patient satisfaction.

Integrity

- We uphold the highest standards of behavior encompassing fairness, trust, respect, and ethical practices.

Collaboration

- Teamwork is the key to our success. Working together, we ensure everyone benefits from our collective wisdom.

Continual Improvement

- We embrace and encourage creativity and innovation, as well as on-going self-evaluation of our processes and outcomes.

Compassion

- By our thoughts, words, and deeds, we create and maintain a caring, compassionate environment.

Stewardship

- We are accountable to make wise use of time, skills, and resources.

Service Statement

Providing Care and Comfort is our highest mission...

WE PLEDGE TO OUR GUESTS AND EACH OTHER:

- the finest in personal service
- courtesy and respect
- a satisfying experience

STANDARDS OF CONDUCT

- QUALITY OF CARE We are committed to providing high quality of care to patients and to deliver services and duties in a responsible, reliable, appropriate and cost effective manner.
- PRIVACY AND CONFIDENTIALITY We maintain the privacy and confidentiality of information entrusted to us in accordance with legal and ethical standard.
- COMPLIANCE WITH LAWS AND REGULATIONS We shall operate our health care enterprises in accordance with all applicable laws and regulations and in a manner which is sensitive to the needs and justifiable expectations of the various publics we serve, including patients, physicians and other health care professionals, fellow team members, contractors, suppliers, lenders and governmental entities.
- SAFEGUARDING THE PROPERTY AND INTERESTS We are committed to protecting East Jefferson General Hospital's assets, and those assets of others entrusted to us, including physical property and proprietary information, against loss, theft, and misuse.
- MAINTAINING A SAFE HEALTHCARE ENVIRONMENT We shall use our resources wisely and with accountability to East Jefferson General Hospital, fellow team members, patients, customers, vendors, and our community. This includes operating our business activities in an environment wherein the health, safety, privacy and comfort of patients and team members is a major priority.
- PROPER CONSIDERATION OF HUMAN RESOURCES We shall treat all people with respect, dignity and courtesy. East Jefferson General Hospital seeks to create a stimulating, productive and safe environment in which fairness, equal opportunity and professional development flourish for the benefit of all.
- BILLING AND CODING We are committed to honesty, accuracy and integrity in all of our billing, coding and documentation activities. Team members have a duty to report any actual or perceived false, fraudulent, inaccurate or fictitious claims or documentation to management, Human Resources, Compliance Officer or the Hotline.

QUALITY OF CARE

We are committed to providing high quality of care to patients and to deliver services and duties in a responsible, reliable, appropriate and cost-effective manner.

- We have a duty to provide medical services and products to patients which are safe for intended us and which comply with all applicable laws, regulations and professional standards.
- We shall provide high quality, cost effective health care services that respond to individual, family and community needs in a safe, healing environment.
- We will seek out and employ only health care professionals with proper experience and expertise in meeting the needs of their patient population.
- East Jefferson General Hospital's patients must be treated in a safe manner at all times with dignity and respect for their cultural diversity and needs.
- We shall strive to ensure that patients are always well informed about treatment alternatives and the various risk factors associated with each treatment or no treatment.
- It is the intent of East Jefferson General Hospital to understand, in so far as we are able, the requirements and needs of our patients and do the very best we can to fulfill our obligations by providing high quality services.
- We shall identify areas for improvement and take steps to make positive changes.
- We are encouraged to communicate and demonstrate openness, honesty, and integrity through lawful and positive relationships with patients, customers and regulatory agencies.
- East Jefferson General Hospital team members should never ignore questions, deficiencies and/or errors, no matter how insignificant they may seem. It is important that all such matters be addressed and assessed in a timely manner by those qualified.
- At East Jefferson General Hospital, consideration of the patient comes first and all team members have as their duty the protection of patient health, safety, security, well-being and comfort.
- We are committed to verifying the credentials of all medical professionals, including whether they have been the subject of adverse actions for conduct or performance that would impact on their duties and responsibilities as a quality provider of service.
- In all of East Jefferson General Hospital's relationships with physicians, it will be stressed that treatment will be based solely on clinical needs.
- We shall comply with all standards and procedures set forth in the JCAHO guidelines to remain accredited by JCAHO.
- We collect information about patients' medical condition, history, medication and family illnesses to provide quality care. We shall not release or discuss patient-specific information with others unless necessary to serve the patient or required by law.

PRIVACY AND CONFIDENTIALITY

We maintain the privacy and confidentiality of information entrusted to us in accordance with legal and ethical standards.

- We will respect the privacy of our patients, co-workers and customers and safeguard patient, employee and customer information from physical damage and protect the privacy of our patient's health records according to state, federal and accreditation requirements.
- We will maintain medical and businesses documents and follow our record retention policy in accordance with the law, HIPAA and other applicable guidelines.
- We will only reveal medical, clinical or business information when such release is supported by a legitimate clinical or business purpose, and in compliance with policies and procedures, applicable laws, rules and regulations.
- We will not discuss patient, team member or customer information in any occupied public area, including elevators, hallways, stairwells, restroom, lobbies and dining areas.
- We will exercise care to ensure that confidential and proprietary information is carefully maintained and managed to protect its value, including salary, benefits, payroll, personnel files and information on disciplinary matters as confidential information while maintaining computer passwords and access codes in a confidential and responsible manner.

COMPLIANCE WITH LAWS AND REGULATIONS

We shall operate our health care enterprises in accordance with all applicable laws and regulations and in a manner which is sensitive to the needs and justifiable expectations of the various publics we serve, including patients, physicians and other health care professionals, fellow team members, contractors, suppliers lenders and governmental entities.

- East Jefferson General Hospital and its team members will conform to all applicable laws, regulations, standards and other compliance requirements at all levels of government and within the various health professionals employed by East Jefferson General Hospital.
- We will not pursue any business opportunity that requires engagement in unethical or illegal activity.
- All contracts will be reviewed and approved by East Jefferson General Hospital's Legal Counsel, or by outside counsel that East Jefferson General Hospital retains for this purpose.
- Submission of any claims for payment or reimbursement of any kind that are false, fraudulent, inaccurate, incomplete or fictitious is unacceptable and will not be tolerated.
- Services must be billed using only billing codes that accurately describe the services that were provided, and if inaccuracies are discovered in bills that have already been submitted, the Patient Financial Services Department or the EJPN Billing Department should take immediate steps to alert the payor and correct the bill.
- Only appropriately licensed/credentialed individuals may provide ancillary and programs services that are billed by East Jefferson General Hospital.
- Team members may cause billing only for services actually rendered and which are fully documented in patient's medical records.

- East Jefferson General Hospital stakeholders and the public have a right to expect that all business will be conducted ethically and competently by team members in compliance with all applicable laws and regulations.
- We do not pay team members, physicians, or health professionals for referrals of patients. East Jefferson General Hospital only pays people or entities for services provided to its patients. East Jefferson General Hospital does not make payments or provide non-cash benefits (e.g. office space) to any physician or health professional providing services without a written contract which has been approved through the approval process.
- Fraud, kickbacks or bribes intended to induce client referrals or admissions are prohibited.
- All marketing and advertising shall comply with laws and regulations.
- We shall protect East Jefferson General Hospital's patient and proprietary information; such information may not be used for personal gain or gain by others.
- We shall not, without permission, use or reveal any confidential information concerning East Jefferson General Hospital, or use for personal gain confidential information obtained as a team member of East Jefferson General Hospital.

SAFEGUARDING OF PROPERTY

We are committed to protecting East Jefferson General Hospital's assets, and those assets of others entrusted to us, including physical property and proprietary information, against loss, theft, and misuse.

- We shall use or resources wisely and be accountable to ourselves and to others.
- Every team member is charged with the duty to preserve assets, property, facilities, equipment and supplies.
- Disposal of surplus, obsolete or junked property will be in accordance with policies. Unauthorized disposal of property is considered a misuse of assets.
- Team members and staff may not use or reveal outside the context of official duties at East Jefferson General Hospital, any confidential patient or proprietary information or use directly or indirectly for personal gain or disclose confidential information obtained as a team member of East Jefferson General Hospital.
- We are committed to developing and maintaining a system of internal controls to adequately protect the assets of the hospital against fraud, waste, and abuse.
- We shall ensure that drugs and other pharmaceuticals are safely stored, secured, inventoried, and that missing supplies are promptly reported to supervisors.
- Team members have a clear obligation to use productively and efficiently the time that is paid for by East Jefferson General Hospital. We shall report time and attendance accurately.
- We follow the laws regarding intellectual properties, including patents, trademarks, copyrights, and software and do not copy computer software unless it is specifically allowed in the license agreement.
- Only authorized personnel may have access to East Jefferson General Hospital computer systems and software. As a healthcare information services company, East Jefferson General Hospital has access to

sensitive medical and financial information of our clients. East Jefferson General Hospital will take all reasonable steps to protect its computer systems and software from unauthorized access or intrusion.

- Team members may not accept gifts except in accordance with Hospital policy, state law and the Jefferson Parish Code of Ethics. Team members may not solicit gifts. Perishable or consumable gifts given to a department or group are allowed.
- We shall not engage in any outside employment that interferes with our ability to adequately perform our duties at East Jefferson General Hospital. Placing business with any firm in which there is a family relationship, or hiring or having a reporting relationship to relatives may constitute a conflict of interest. Advance disclosure and approval are required in such a situation.
- If an East Jefferson General Hospital team member believes a conflict of interest exists, the team member must treat the situation as if a conflict definitely exists until the team member and other appropriate East Jefferson General Hospital officials have resolved the potential conflict.

MAINTAINING A SAFE HEALTHCARE ENVIRONMENT

We shall use our resources wisely and with accountability to the East Jefferson General Hospital fellow team members, patients, customers, vendors, and our community. This includes operating our business activities in an environment wherein the health, safety, privacy and comfort of patients and team members is a major priority.

- We will protect the health, safety, and privacy of our patients as well as our team members.
- We are committed to maintaining a safe and healthy treatment and work environment for our patients, medical staff, team members, visitors and customers that is in accordance with applicable laws and regulations.
- Team members are expected to exercise good judgment with regard to environmental aspects of the use of buildings, property, lab processes and medical products.
- We shall exercise policies and procedures regarding safety and security management and response in the event of local terrorist acts related to nuclear, biological or chemical exposure.
- All team members of East Jefferson General Hospital are obligated to perform their work in a manner so that no reasonably avoidable harm is caused to self, patients, other team members, or otherwise.
- All team members and staff at East Jefferson General Hospital are required to report to their supervisor any practice or condition that may violate any rule, regulation, or safety standard.
- Any team member reporting to work or discovered at work in a condition that suggests that he is under the influence of narcotics, illegal drugs, prescription drugs used improperly or causing impairment of function, or alcohol will not be permitted to report to or remain on his job.
- Team members are expected to be familiar with all of the East Jefferson General Hospital's safety and health practices.
- Team members responsible for the handling and disposal of hazardous substances and infectious waste must do so in a proper manner. Team members who are uncertain of the correct procedures for disposing of any such material should consult their supervisors for assistance.
- We shall maintain a drug-free workplace and strive to maintain a smoke-free workplace.

PROPER CONSIDERATION OF HUMAN RESOURCES

We shall treat all people with respect, dignity and courtesy. East Jefferson General Hospital seeks to create a stimulating, productive and safe environment in which fairness, equal opportunity and professional development flourish for the benefit of all.

- We shall reasonable protect, support and develop East Jefferson General Hospital's human resources to the fullest of their potential in a fair and equitable manner.
- All supervisors and managers are to be strongly supportive of equal employment and advancement opportunities required by law and ensure that all team member relation decisions will be in accordance with this policy.
- Proper respect and consideration will be shown for all team members and staff. Discriminatory treatment, sexual harassment, and unlawful harassment of any type will not be tolerated at East Jefferson General Hospital.
- East Jefferson General Hospital encourages and supports team members seeking to develop their individual skills, talents, knowledge, and understanding of their job in delivering the highest quality of service and benefit to our patients.
- We shall provide a competitive salary and benefits package based on area norms, economic conditions, and the needs of its team members.
- We shall ensure that East Jefferson General Hospital policies and procedures are followed in the performance of our duties.
- We shall not permit any action of retaliation or reprisal to be taken against any team member who reports a violation of law, regulation, East Jefferson General Hospital policy or Standards of Conduct.
- We seek to employ those best qualified by skills, experience and/or education to perform the necessary work. All team members will receive appropriate training and orientation for the performance of their duties to meet the needs of our customers.
- We seek team members, vendors and business partners who have not been sanctioned by any regulatory agency and are able to perform their designated responsibilities.
- We strive to be fair and consistent in our treatment of team members, in accordance with our policies and procedures.
- We expect all team members and staff to conform to the standards of their professions and exercise appropriate judgment and objectivity in the performance of their duties.
- Verbal and physical contact of a sexual nature by any team member, supervisor or manager including sexual advances, requests for sexual favors or other conduct which tends to create an intimidating, hostile or offensive work environment is strictly prohibited.
- We shall expect all team members to report all suspected violations of hospital policies, laws, or regulations and we have established a confidential disclosure program for that purpose.

BILLING AND CODING

We are committed to honesty, accuracy and integrity in all of our billing, coding and documentation activities. Team members have a duty to report any actual or perceived false, fraudulent, inaccurate or fictitious claims or documentation to management, Human Resources, Compliance Officer or the Hotline.

- We shall submit payment or reimbursement claims only for services actually rendered that are fully documented in patients' medical records and shall use billing codes that accurately describe the services provided.
- We shall ensure that all claims submitted for payment are supported by documentation of medical necessity.
- We are committed to engaging in accurate and truthful billing practices. The submission of any claims for payment of any kind that are false, fraudulent, inaccurate, incomplete or fictitious is strictly prohibited.
- We shall take immediate steps to alert appropriate East Jefferson General Hospital staff if inaccuracies are discovered in claims that have been submitted for payment or reimbursement and will promptly submit a corrected claim, refunding any money that is not due us.
- We shall always document physician information in the medical record to ensure that all claims are submitted with the proper provider number.
- We will ensure that physicians and team members are not sanctioned or excluded from the Medicare, Medicaid, Tricare or other federally funded programs.
- We shall submit to governmental authorities only accurate reports and we shall not make false or deceptive statements.

ADDRESSING ISSUES AND CONCERNS

Team members who raise concerns or allegations of possible violations of the Standards of Conduct, policies/procedures, laws, or regulations will be received openly and courteously, *and will remain confidential up to the limits of the law*. There will be no direct or indirect retaliation or retribution against anyone who, in good faith, raises problems or concerns.

If you have a concern regarding conduct that you suspect to be illegal or fraudulent occurring in the hospital, you should report this to your Supervisor, Director or Executive Team Member immediately. Call the toll-free Compliance Hotline if you are not comfortable with the chain of command. The Hotline is available to any team member to report problems or concerns in good faith, although it is not intended to replace the normal chain of command.

This Hotline is intended to identify and address fraudulent and illegal conduct as quickly and effectively as possible. If you call the Compliance Hotline to report suspected fraud or illegal conduct by others, you should do so without fear of retaliation or reprisal.

OTHER CONCERNS

For other concerns that do not involve fraud or violations of law, the following procedures should be utilized until resolution of the concern is achieved:

- First, contact your direct supervisor/manager unless there are circumstances that preclude your doing so. Your supervisor/manager is in a good position to listen to you and understand your concerns and should be given the opportunity to resolve the issue. Your supervisor/manager has access to resources throughout the hospital to assist you in upholding the Standards of Conduct.
- Second, if you have raised an issue and you do not think it is getting proper attention or if your supervisor/manager cannot find the appropriate answer, you may relate your concerns to the next level of management.
- Third, seek guidance from the Human Resources Department, and/or the appropriate Executive Staff member.

If assistance is still needed, or if you feel more comfortable reporting directly to the Corporate Compliance Officer, call the toll free East Jefferson General Hospital Compliance Hotline at (877) 631-0016.

Before calling the Compliance Hotline, ask yourself the following questions:

- Do I have all the facts?
- If I need more information, where do I find it?
- Are there any laws, regulations, policies or procedures that apply to the situation?
- Have I followed normal procedures to try to resolve my concern?

In addition, the Compliance Officer may be reached at (504) 454-4883, or you may write to the Compliance Officer at East Jefferson General Hospital, 4200 Houma Boulevard, Metairie, LA 70006.

**East Jefferson General Hospital
STANDARDS OF CONDUCT**

TEAM MEMBER CERTIFICATION OF RECEIPT AND UNDERSTANDING

I, _____

(Print Name)

(Position)

am a team member of **East Jefferson General Hospital**.

I certify that I have received the **East Jefferson General Hospital Standards of Conduct**, *participated in Standards Training, read and understand that compliance with the provisions of the Standards of Conduct are mandatory, and will abide by its provisions.*

(Signature)

(Date)