

Policy No. 105

Effective: 8/1/06

Revision(s): 01/08

Reviewed: 8/1/06

Approved: _____

Corporate Code of Conduct

SCOPE: St. John's Health System, Inc. and all subsidiary organizations (collectively "St. Johns").

POLICY:

In keeping with our mission, St. John's provides high quality compassionate health care services in a personalized Christian environment for those in need. Our five core values guide our decisions and actions:

- **Dignity-** accepting of all persons as created in the image of God
- **Justice-** honoring each person's rights and responsibilities in light of the common good
- **Service-** Responding with compassion to the needs of others
- **Excellence-** striving to attain high standards of performance and proficiency
- **Stewardship -** using our talents and resources wisely

PURPOSE:

The purpose of this policy is to communicate to our co-workers, physicians, patients and communities we serve our organization's ethical commitment to act in accordance with our mission. This commitment includes all hospitals, clinics, home services, managed care services and also co-workers and physicians.

The mission statement is the foundation to guide policy and procedure development, and also for providing guidance in the lack of a policy.

PROCEDURE:

St. John's and its subsidiary organizations are committed to ethical and legal business practices which are consistent with Mercy Values. We recognize the provision of healthcare is a highly regulated industry in which there are complex, overlapping, and sometimes inconsistent federal and state regulations.

It is the expectation that all co-workers, agents, or representatives of St. John's will use their best efforts to comply with federal and state regulations concerning the work environment, the provision of patient care and the timely and accurate submission of billing information.

St. John's will use its best efforts to communicate to all co-workers specific federal and state regulations affecting individual and departmental duties and provide appropriate education and training related to such duties.

In addressing ethical issues in the organization, care should be taken so that the values of St. John's are integrated into all clinical and business decisions, policies, and practices. Ethical conduct at St. John's is guided by the Ethical and Religious Directives for Catholic Health Care Services and by organizational documents and processes which have been developed with input from co-workers, physicians, and the Sisters of Mercy Health System. Ethical behavior is guided by, but not limited to, the following organizational documents:

- Mission Statement-(Policy No. 102)
- Corporate Compliance Program-(Policy No. 624)
- Research Involving Human Subjects-(Policy No. 625)
- St. John's By-laws

KEY GUIDING PRINCIPLES:

Patient Rights and Responsibilities: Ethical relationships with patients and their families or surrogates are described in the Patient's Rights and Responsibilities document. This is emphasized in co-worker orientation, continuing co-worker education, publication in the patient handbook, posting of patient rights in public areas, patient representative visits and public forums about advance directives and other topics related to patient rights. Policies, procedures, and documents that support patient rights include, but are not limited to, the following:

- Position Statement on End-of-Life Care-(Policy No. 104)
- Research Involving Human Subjects-(Policy No. 625)
- Sentinel Event Policy-(Policy No. 630)
- Product/Device Failure, Recall, Alert-(Policy No. 616)
- Patient Advocacy Reporting System—(Policy No. 610)
- Patient Advocacy-(Policy No. 806)
- Ethics Consultations- (Policy No. 702)
- Responding to Ethical Concerns and Resolving Ethical Conflicts in the Care of Patients- (Policy No. 703)

-
- Commitment to Respect and Care-(Policy No. 801)
 - Assessing Patient's Decisional Capacity-(Policy No. 802)
 - Surrogate Decision Making-(Policy No. 803)
 - Patient's Rights to Self-Determination in Health Care Decisions-(Policy No. 805)
 - Medical Futility and Communication with the Patient/Family-(Policy No. 905)

Relation to, Health Care Providers, Payers and Educational Institutions:

St. John's serves as an educational resource both for its own educational programs and as a clinical setting for other educational institutions (e.g. local colleges, schools of nursing, schools of medicine, etc.) The relationship of St. John's to these educational institutions is defined in the contracts with these institutions. Students from outside institutions will wear uniforms and/or identification badges signifying their institutional affiliation. Students will operate under appropriate supervision and guidance. Patients may request that students may not participate in their care.

St. John's maintains a number of relationships with other health care providers and payers. In these relationships, St. John's co-workers and physicians are expected to deal fairly and honestly with other parties and in compliance with all applicable laws and regulations. St. John's relationship with another health care provider or payer should not interfere with a patient's right to receive appropriate medical service or to choose the provider of his or her choice.

Patients should be made aware of St. John's ownership or affiliation with other providers or facilities when are recommended for continuing care. Specific details of St. John's relationship to outside entities are found in the contracts with those entities.

Clinical Decision Making Integrity:

At St. John's, the integrity of clinical decision making will be protected.

Clinical decisions (including tests, treatments, admissions, discharge, transfer, and other interventions) are based upon identified patient health care needs and the development of effective treatment modalities for the individual patient. Other considerations, such as financial incentives, should not compromise clinical decision making or the quality of care. In all St. John's hospitals and clinics providing patient services, appropriate steps to assure that patients receive appropriate services based on assessed needs regardless of ability to pay or third party payer reimbursement will be taken. Specific policies supporting the integrity of clinical decision making include the following:

- Mission Statement-(Policy No.102)
- Corporate Compliance Plan-(Policy No. 624)

Conflict of Interest Policy: St. John's recognize that the potential for conflict of interest exists during decision making at all levels of the organization, the governing board, administration, medical co-workers, and all other co-workers. However, the leadership of St. John's carefully

reviews our business relationships to avoid potential harm to patients and community and any potential conflicts of interest. Policies supporting, circumstances that might result in potential conflicts of interest include the following:

- Conflict of Interest Policy – (Policy No. 635)
- Contract Compliance-(Policy No. 611)
- Contract Signing Authority and Capital Approval Limits-(Policy No. 620)
- Corporate Compliance Program-(Policy No. 624)

Admission, Transfer and Discharge Practices: Admission, transfer and discharge policies are based on patient need and not on ability to pay. Patients whose condition cannot be safely treated are diverted or transferred to an accepting organization. Admission, transfer and discharge are conducted in an ethical manner and in accordance with applicable local, state and federal regulations and the following policies:

- Patients Rights, (Policy Nos. 801-808)
- Emergency Medical Treatment and Active Labor Act (EMTALA) and Transfer Procedures as defined by law
- **Billing Practices:** St. John's Hospitals and Clinic seek to ensure that patients are billed in a timely fashion with accurate, understandable statements that charge only for services rendered. St. John's Hospitals and Clinics maintain appropriate co-workers to respond to inquiries and assist patients in the billing process. General credit/collection procedures are conducted according to the fair debt collection practices at each St. John's Hospital and Clinic.

Charity Care/Financial Assist: St. John's Hospital and Clinic affirms and maintains its commitment to meet the health and medical needs of our communities in a manner consistent with the Mission, Vision, and Core Values of the Sisters of Mercy Health System (Mercy). Each St. John's Hospital and Clinic provide for charity care in a manner consistent with this policy.

Marketing and Public Relations Practices: Marketing is a process of analysis, planning, and implementation designed to promote interaction between an organization and the community it serves based on the mission and values of the organization. St. John's will conduct its marketing practices with truth, accuracy, fairness and responsibility to patients and the community, holding to the principles of the value and dignity of each individual freedom of speech, assembly and the press. In the spirit of communication, understanding and cooperation among individuals, groups and institutions, St. John's adheres to the Code of Professional Standards for the practice of public relations adopted by the Governing Assembly of the Public Relations Society of America. Specifically, St. John's has adopted policies, relating to Marketing and Public Relations, as the following:

- Use and Disclosure of Protected Health Information for Marketing Purposes-(Policy No. 1112)

-
- Use and Disclosure of Protected Health Information for Fundraising Purposes-(Policy No. 1113)

Resolution of Potential Breaches of Ethical Integrity

St. John's values its ethical integrity, and provides assistance to its various Board members, administration, physicians, and co-workers in the ethical analysis and resolution of matters. St. John's encourages individuals to resolve any conflicts first within the various departments and with its managers. Additional assistance may be sought from Ethics Department, General Counsel, or the Corporate Compliance Officer. Policies governing these processes include the following:

- Complaints Regarding Privacy Policies and Procedures-(Policy No. 1122)
- Sanctions for Failure to Comply with Privacy Policies and Procedures-(Policy No. 1123)
- Corporate Compliance Program-(Policy No. 624)