

TRINITY HEALTH  
Code of Conduct



Updated March 21, 2023



## CONTENTS

INTRODUCTION	3
A Message from Leadership	3
Responsibilities of All Who Serve in Trinity Health	4
Responsibilities of Leaders	4
Violations of Our Code of Conduct	5
CODE OF CONDUCT: SUPPORTING RIGHT RELATIONSHIPS	6
Relationships with Those We Serve	6
Relationships with Coworkers and Others Who Serve With Us	10
Relationships with Suppliers and Other Business Partners	13
Relationships with Regulators and Those Who Pay for Our Services	17
Relationships with Trinity Health and Communities We Serve	21
RESOURCES TO ASSIST YOU	26
Where to Find Help	26
Integrity & Compliance Line	27
Non-Retaliation Policy	27
ACKNOWLEDGMENT AND CERTIFICATION	28
INDEX OF TOPICS	29

## MISSION

We, Trinity Health, serve together in the spirit of the Gospel as a compassionate and transforming healing presence within our communities.

## CORE VALUES

REVERENCE

COMMITMENT TO THOSE WHO ARE POOR

SAFETY

JUSTICE

STEWARDSHIP

INTEGRITY

Dear SJH and SPHP Colleagues:

Our Mission 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 creating a trusting relationship with every person, in whatever manner they connect with us as a member of our health system, caring for the whole person — mind, body, and spirit, and building a health system that leads to better health, better care and lower costs for the patients, residents, members, and communities we serve.

We have a long, rich history of service to our communities and have achieved a well-deserved reputation built on excellent service and compassionate care. Those we serve place enormous trust in us and maintaining that trust is a commitment we take very seriously. Acting with integrity, being honest and following all laws and regulations that apply to our health system are behaviors and actions that build and ultimately maintain trust.

We have established a system-wide Integrity and Compliance Program to assist all colleagues in understanding and following the laws, regulations, professional standards and ethical commitments that apply to our health system. This Code of Conduct is an important resource to help each of us, and our organization, fulfill these obligations. The Code of Conduct describes behaviors and actions expected of all who work at SJH and SPHP. While not intended to address all possible legal, regulatory or ethical issues, the Code of Conduct addresses the more common issues and questions you may encounter in your work here. It provides resources to assist you when you have questions or need further assistance and it explains your duty to speak up and report, without fear of retaliation, any matters you believe may be a violation of our Code of Conduct.

Our Core Value of Integrity — we are faithful to who we say we are — reflects our commitment to carrying out our mission with the highest standards of ethical behavior.

Thank you for your dedication and commitment to this very important effort.

A handwritten signature in black ink, appearing to read 'S. Hanks', with a long horizontal line extending to the right.

STEVEN HANKS, MD, MMM, FACP, FFSMB  
President & CEO  
St. Joseph's Health and St. Peter's Health Partners

## INTRODUCTION

### Responsibilities of All Who Serve in Trinity Health<sup>1</sup>

This Code of Conduct outlines responsibilities expected of all who work in Trinity Health. The Code of Conduct applies to all Trinity Health organizations, colleagues, volunteers, medical staff members, suppliers, independent contractors, consultants, and other business partners that work for or provide goods and services to our health care ministry.

All who serve in Trinity Health play an important role in supporting our Code of Conduct and are responsible to:

- Review and follow the Code of Conduct, paying particular attention to those areas that apply to your daily work.
- Ask questions and seek guidance when you are uncertain what to do. See Resources to Assist You (page 26) for a listing of resources available to answer your questions.
- Speak up and report concerns about actions or behaviors you encounter in Trinity Health that may be inconsistent with our Code of Conduct. There are many options available to you to report issues and concerns, including your supervisor, a higher-level manager, Human Resources, your organization's Integrity & Compliance Officer, and the Trinity Health Integrity & Compliance Line at 866-477-4661 or online at [www.mycompliancereport.com](http://www.mycompliancereport.com). See Resources to Assist You (page 26) for more information.
- Participate in periodic training programs to further your understanding of our Code of Conduct, its application to your work in Trinity Health, and your responsibilities.

### Responsibilities of Leaders

While all colleagues are required to follow our Code of Conduct, leaders in Trinity Health, including all individuals in a position of supervisory responsibility, are held to a high standard of responsibility. We expect our leaders to set the example, to serve as a role model in every respect for the Code of Conduct. Leaders serve a key role in receiving and responding to questions and concerns raised by colleagues and others they lead. How leaders respond to questions and concerns posed to them is critically important to ensuring that those they lead have the trust and confidence to bring important matters to their attention.

Leaders in Trinity Health have a responsibility to:

- Serve as a role model for supporting our Mission and Core Values.
- Set a personal example for modeling high ethical standards in the performance of their duties.
- Clearly communicate expectations for high standards of ethical behavior to those they lead.
- Promote a culture of trust, open communication and respect.
- Ensure those they lead understand and apply the guidance set forth in our Code of Conduct and hold them accountable.
- Encourage those they lead to ask questions and raise issues and concerns.
- Respond timely and appropriately when matters are brought to their attention.
- Comply with Trinity Health's non-retaliation policies.

<sup>1</sup> Throughout this document, references to Trinity Health refer to the System Office and all ministries and subsidiaries.



### Violations of Our Code of Conduct

The standards set forth in our Code of Conduct are mandatory and must be followed. All colleagues, members of the medical staff, and others who serve in Trinity Health are expected to use common sense and good judgment in their personal behaviors and Trinity Health work activities consistent with the standards outlined in the Code of Conduct. Individuals will be held accountable for behaviors and actions inconsistent with the Code of Conduct. The precise discipline taken will depend on the nature, severity and frequency of the violation and may result in oral or written warnings, suspension or termination.

The following are examples of behaviors and conduct that can result in disciplinary actions:

- Knowingly authorizing or participating in a violation of law and regulations.
- Withholding information or failing to report violations.
- Deliberately falsifying documentation in medical records.
- Leaders, supervisors or managers that fail to provide adequate supervision or display lack of diligence in assuring compliance with law, regulation, policy or the Code of Conduct.
- Retaliating against individuals who report issues and concerns in good faith.
- Deliberately filing false or frivolous reports of violations.
- Falsifying documentation in medical records.
- Actions that are discriminatory or rise to the level of harassment.
- Reckless actions or behaviors that jeopardize the privacy and security of personal health information and other confidential business information.

## CODE OF CONDUCT: SUPPORTING RIGHT RELATIONSHIPS

Our Core Value of Justice calls all who work in Trinity Health to foster right relationships that promote the common good, including sustainability of the Earth. Virtually everything we do in Trinity Health is dependent on maintaining relationships: with our patients, residents, their family members and our communities; with co-workers and others who serve with us in our health care ministry; with suppliers, business partners, and others we rely upon for needed goods and services; with regulators that oversee our industry, and with federal and state health care programs, commercial insurers and others that pay for the services we deliver. Maintaining these relationships is essential to fulfilling Trinity Health's Mission.

---

Our Core Value of  
Reverence calls us to  
honor the sacredness  
and dignity  
of every person.

---

Successful, long-term relationships are ultimately built on trust. Maintaining trust is dependent on our behaviors and actions. Acting with integrity, being honest, and following all laws and regulations are behaviors and actions that build and maintain trust. Our Core Value of Integrity — we are faithful to who we say we are — provides clear guidance for how we are to carry out the Mission of Trinity Health every day in our behaviors and actions.

### Relationships with Those We Serve

Trinity Health exists to serve as a transforming healing presence in our communities across the United States. Our Core Value of Reverence calls us to honor the sacredness and dignity of every person. Patients, residents, their family members and loved ones, and others who entrust their care to us are our number one priority. Whether you are directly involved in the delivery of care, or serve in a supporting role, you are expected to:

- Deliver people-centered, quality health care services with compassion, dignity and respect for each individual.
- Commit to safety: every patient and resident, 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.
- Deliver services without regard to race, color, religion, sex (including sexual orientation and gender identity), pregnancy (including childbirth, lactation and related medical conditions), national origin, ancestry, age, physical or mental disability, genetic information (including testing and characteristics), veteran status, uniformed servicemember status, or any other status protected by applicable local, state or federal law.
- Maintain a positive and courteous customer service orientation.
- Demonstrate the highest levels of ethical and professional conduct at all times and under all circumstances.
- Speak professionally and respectfully to those you serve.
- Respond to requests for information or assistance in a timely and supportive manner.
- Provide comfort for our patients and residents, including prompt and effective response to their needs.
- Discuss available treatment options openly with patients, residents, or their 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.
- Deliver services in accordance with all professional standards that apply to your position.
- Create and maintain complete, timely and accurate medical records.

- Protect the privacy and confidentiality of all personal health information — electronic, paper or verbal — you may receive.
- Clearly explain the outcome of any treatment or procedure to patients, residents, or their designees, especially when outcomes differ significantly from expected results.
- Respect patient or resident advance directives.
- Address ethical conflicts that may arise in patient or resident care, including end-of-life issues, by accessing your organization’s medical ethics committee.
- Provide care that is consistent with the Ethical and Religious Directives for Catholic Health Care Services.



### Quality of Care and Patient Safety

Trinity Health is committed to providing high-quality care that is safe, effective, efficient, and compassionate. Safety is our first priority. We do everything we can to make sure the care we provide is safe. And we design the systems we use with safety first in mind.

Trinity Health is committed to a Just Culture. A Just Culture recognizes that individuals should not be held accountable for system failings over which they have no control. A Just Culture emphasizes learning from our mistakes so they are not repeated. A Just Culture encourages all who work in Trinity Health to report safety issues, incidents and “near misses” so they can be addressed timely through changes to systems and processes without fear or blame.

### Medically Necessary and Appropriate Care

We treat all patients and others in our care with respect and dignity, providing care that is both necessary and appropriate. Medical care decisions are made with the best interests of our patients and others we serve in mind. We assist patients and others in making high-quality, informed decisions regarding their care, and we respect and honor their personal care decisions.

### Protecting Personal Health Information (PHI)

We collect personal health information (PHI) from patients, residents, members and others in our care, including current and past medical conditions, medications, and family histories, in order to provide effective, high-quality care. We recognize the sensitive nature of this information and are committed to maintaining its confidentiality. PHI is collected in many ways — in paper and electronic records, films and digital images, and even in verbal discussions. All PHI, in whatever form, should be protected and treated confidentially consistent with our Core Value of Reverence and in accordance with federal and state laws.

- Do not access, review or use PHI unless necessary to perform your job.
- Do not leave PHI (electronic or paper) unattended or available to others.
- Do not discuss PHI in public areas e.g., cafeterias, restrooms, or elevators.
- Do not store PHI on laptops or tablets not authorized and approved for use in Trinity Health.
- Do not release PHI to others or remove PHI from your facility without authorization from your immediate supervisor.
- Do not discuss or post PHI on any social media sites such as Facebook or Twitter whether using at work or at home.
- Immediately notify your supervisor or your organization’s Privacy Official if you believe PHI has been lost, stolen or accessed inappropriately.

Trinity Health has implemented specific policies and procedures to protect the privacy and security of PHI. Consult your organization’s policies and procedures for more information.

## Gifts From or To Patients and Residents

You may not solicit or accept gifts, money, favors, etc., from patients, residents or their family members. Occasional perishable or consumable gifts given to a department or unit by a patient or patient's family may be accepted. If patients, residents, family members or other loved ones wish to present a gift of money, refer them to your organization's fundraising department or foundation. The solicitation of gifts is limited to colleagues that work in foundations or specific fundraising departments.

There are also laws that prohibit health care providers from giving free or discounted items or services to patients or residents covered by federal and state health care programs unless specific requirements are met. Any gifts or other items of value provided Medicare or Medicaid beneficiaries may not exceed \$15 per item or more than \$75 per year per recipient. Please discuss with your supervisor or consult your organization's policies before extending any gifts to a Medicare or Medicaid patient or resident.

In some cases, it is permissible to offer patients in-kind items and services that are preventive care in nature or advance a clinical goal of a participating patient such as adherence to a treatment regime, drug regime, follow-up care plan or the management of a chronic disease or condition. Any program providing in-kind items or services to patients must be approved by Trinity Health senior management in consultation with Trinity Health's Integrity & Compliance Officer and Legal Counsel.

## Emergency Medical Treatment and Active Labor Act (EMTALA)

Trinity Health hospitals with a dedicated emergency department follow the Emergency Medical Treatment and Active Labor Act requirements to provide a medical screening examination and necessary stabilization to any individual who comes to the emergency department before asking any questions about their ability to pay for services. Provided we have the capacity and capability, anyone with an emergency medical condition is treated. In an emergency situation or if the patient is in labor, we do not delay the medical screening and necessary stabilizing treatment in order to seek financial and demographic information. We do not admit, discharge, or transfer patients with emergency medical conditions simply based on their ability or inability to pay or any other discriminatory factor.

## Ethical and Religious Directives for Catholic Health Care Services

Also called the ERDs, these directives provide official church guidance and teachings on issues that are central to Trinity Health as a Catholic health care ministry. Colleagues, medical staff and others working in Trinity Health are required to abide by the ERDs. Consult your organization's Mission Leader if you have questions regarding how the ERDs may apply to your work.

## Questions & Answers

- Q** If I see that a patient is not being treated with proper respect and courtesy by another care provider, what should I do?
- A** First, act immediately if the patient is at risk of harm. Then discuss the situation with your supervisor. If your supervisor does not provide a satisfactory response, contact a higher-level manager in your unit or one of the resources listed on page 26 for assistance. Remember that appropriate role modeling of respectful behavior is expected of all colleagues each and every day.



Q What should I do if I know that a medical error has occurred? Should I tell the resident or the resident's family?

A First, ensure the medical error has been properly reported to your organization's risk management department using your organization's safety event reporting system (see page 26). Trinity Health supports the timely and compassionate disclosure of medical errors when they occur, but in a manner that ensures proper communication and coordination with all caregivers. Follow your organization's safety event reporting processes to ensure the communication with the resident and family is handled appropriately.

---

Q I recently had a patient tell me that he doesn't want to receive any more aggressive treatment and wants to be made comfortable and be allowed to die. He doesn't think I or any of his caregivers are listening to him. What should I do?

A People-centered care is listening to what the patient or resident wants – even if the individual's decision conflicts with your own values. You should make the patient or resident's clinical team aware of his wishes and work with the clinical team and the individual's family on appropriate ways to honor his wishes, for example, palliative care services. It is important that the patient or resident be presented with appropriate options so that any decision made is an informed decision. Please contact your organization's Mission Leader or ethics committee if you have any questions or concerns.

---

Q I work in a hospital and have access to the patient registration system. Recently a friend of mine was seen in the emergency room and later admitted to the hospital. I'm concerned and would like to check the patient registration system to see how she's doing or at least locate which room she's in so I can visit her. Is that okay?

A Since you are not involved in your friend's care, you do not have any business need to access her medical information or location. You may only access this type of information if needed to do your job. Note that Trinity Health has monitoring systems in place to determine whether colleagues have used their system access privileges appropriately. Discipline for inappropriate use of such privileges can include termination.

---

Q My health care provider uses a patient portal where I can look up information in my medical records, such as lab results. Why can't I access my own health information directly through the electronic health record where I work?

A All patients are encouraged to use the patient portal to review their medical information and to effectively partner with clinicians involved in their care. Colleagues given access to Trinity Health's electronic medical record systems are restricted to only accessing information needed to do their job. Accessing your own medical records in Trinity Health information systems is a violation of Trinity Health policies and procedures. Colleagues may only access medical records systems to support patient treatment, payment and ministry operations. Appropriate access and use of medical records systems is continuously monitored by Trinity Health.

---

Q I am a nurse and one of the patients on my floor has asked that his same-sex life partner be included in his discharge planning meeting. This meeting is typically attended by only family members. How should I respond?

- A Since the patient has asked that his partner be recognized as a member of his family for discharge planning purposes, you should invite the patient's partner to attend the meeting. Trinity Health patients, residents, their family members and loved ones have a fundamental right to compassionate care that respects the dignity, diversity and specific wishes of those in our care.

### Relationships with Coworkers and Others That Serve With Us

The delivery of high-quality, safe and effective care requires effective teamwork among all individuals involved. Studies have consistently shown a positive relationship between the work place environment and the quality and safety of care delivered. Trust and respect are important factors in supporting effective teamwork in the workplace. All who work in Trinity Health are expected to:

- Treat others with honesty, dignity and respect.
- Maintain a positive and courteous customer service orientation.
- Speak professionally and respectfully to colleagues and others that serve with you.
- Behave in a manner that enhances a spirit of cooperation, mutual respect and trust among all members of the team.
- Commit to working with others in a supportive team environment.
- Respond to requests for information or assistance in a timely manner.
- Communicate with others in a clear, open, honest and respectful manner.
- Provide and accept appropriate feedback.
- If possible, attempt to address any differences you may have with colleagues directly with the individuals involved.
- Respect the diversity of others and do not discriminate in any employment action based on race, color, religion, sex (including sexual orientation and gender identity), pregnancy (including childbirth, lactation and related medical conditions), national origin, ancestry, age, physical or mental disability, genetic information (including testing and characteristics), veteran status, uniformed servicemember status, or any other status protected by applicable local, state or federal law.
- Abstain from inappropriate physical contact with colleagues and others and report any harassment, intimidation or violence of any kind that you witness in the workplace.
- Promptly report any serious workplace injury or any situation you identify that could present a potential health and safety hazard.
- Protect the confidentiality of colleague social security numbers, medical information and banking and financial information.
- 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.

### Harassment and Workplace Violence

Each Trinity Health colleague has the right to work in an environment free of harassment and disruptive behavior, including behaviors that undermine a culture of safety. Harassment includes degrading or humiliating jokes, slurs, intimidation or any conduct that creates a hostile work environment. Sexual harassment is also prohibited, including unwanted sexual advances, and verbal or physical contact of a sexual nature that creates an intimidating, hostile, or offensive work environment.



Workplace violence is any act or threat of physical violence, menacing, intimidation, or other threatening disruptive behavior that occurs on or off the worksite that impacts work-related activities. It may be intentional or unintentional. It may affect and involve colleagues, clients, residents, patients, physicians, contractors, suppliers and visitors. Colleagues who observe or experience any form of harassment or workplace violence should report the incident to their supervisor, the Human Resources department, or the Trinity Health Integrity & Compliance Line (see page 26 for more information).

### Workplace Safety

Trinity Health is committed to promoting a safe workplace environment for all colleagues and others that serve in our health care ministry. Each Trinity Health organization has developed policies and procedures to protect colleagues and others from potential workplace hazards and to comply with applicable government rules and regulations that promote workplace health and safety. You should be familiar with and understand how these policies apply to your specific job responsibilities and seek advice if you have a question or concern. You should immediately notify your supervisor or your organization's Safety Officer of any serious workplace injury or any situation presenting risk of injury so that timely actions may be taken to resolve the issue.

### Inclusion and Collaboration

Trinity Health is committed to promoting diversity in its workforce and to providing an inclusive work environment where everyone is treated with fairness, dignity and respect. We are committed to recruit and retain a diverse staff reflective of the communities we serve. Trinity Health is an equal opportunity employer and prohibits discrimination against any individual with regard to race, color, religion, sex (including sexual orientation and gender identity), pregnancy (including childbirth, lactation and related medical conditions), national origin, ancestry, age, physical or mental disability, genetic information (including testing and characteristics), veteran status, uniformed servicemember status, or any other status protected by applicable local, state or federal law.

### Controlled Substances

Many Trinity Health colleagues have routine access to prescription drugs, controlled substances and other medical supplies as part of their work responsibilities. Many of these substances are governed by laws and regulations that strictly limit their use to minimize potential risks to both patients and health care workers. Unauthorized access, use or diversion (e.g. theft) of controlled substances is prohibited. Immediately report to your supervisor or a higher-level manager any potential issues or concerns you identify involving the security or diversion of controlled substances.

## Questions & Answers

**Q** I overheard a colleague making jokes about people of certain ethnic backgrounds with other coworkers. It made me feel really uncomfortable. What should I do?

**A** It is not appropriate to make jokes or fun at the expense of others based on ethnic, racial, religious, age, gender, sexual orientation, marital status, disability or other any other characteristic. Even if unintended, this behavior can contribute to an environment of intolerance and, if allowed to continue, can be considered harassment. You should discuss this matter with your supervisor or contact your organization's Human Resources department or Office of Diversity and Inclusion.

---

**Q** My supervisor told me that I have to start work an hour earlier on scheduled work days because we need coverage in the department. Can she do that? I've worked the same schedule of hours for five years.

**A** Yes. Your supervisor has the right to change your work schedule to meet the operating needs of the department. If you are unable to comply with your new work schedule, discuss the matter with your supervisor.

---

**Q** A male colleague has been very "friendly" with several female coworkers in my department. There's a lot of hugging and touching, even when other people are in the room. I don't think this is appropriate, even though the female coworkers involved don't seem to mind. What should I do?

**A** You should discuss the situation with your supervisor. You should also feel free to share your feeling of discomfort directly with the male colleague. He may not be aware that his behavior makes you or others feel uncomfortable. If you remain concerned, contact a higher-level manager or leader in your organization, your Human Resources department or the Integrity & Compliance Line. Note that the situation and recommended actions would be no different if a female colleague initiates the touching with male colleagues or if both parties are of the same gender.

---

**Q** One of my coworkers returned from a break and appears to be under the influence of alcohol or drugs. How should I respond?

**A** First, if you work in a clinical area, act immediately if patients or residents are at risk of harm from the actions of the colleague. Then notify your supervisor, a higher-level manager or your Human Resources department immediately and discuss the situation. There may be a medical condition causing your colleague's behavior rather than alcohol or drugs, but your supervisor or a higher-level manager will be needed to evaluate the situation.

---

**Q** Yesterday I saw a physician yell and scream at a colleague in the presence of a patient and other colleagues. I was very bothered by the physician's behavior and felt terrible for the colleague. Is there anything I can do?

**A** Trinity Health is committed to promoting a respectful work environment. Behavior that is rude, embarrassing, threatening, belittling or intimidating, including the use of profane or abusive language, is not appropriate. You should discuss the matter with your supervisor, a higher-level manager, medical staff office, or contact your Human Resources department or the Integrity & Compliance Line.



Colleagues and others working on behalf of Trinity Health are expected to maintain appropriate business relationships...

- Q** I have a real problem with one of my colleagues. She and I share assignments in my department, but I feel like I carry most of the workload and she just slacks off. I really don't want to work with her anymore. What should I do?
- A** Whenever you have a conflict with a colleague, it is best to first discuss it privately with the person. Explain what you have observed and how it affects the work of your unit. If you don't see a change in behavior, discuss the issue with your supervisor. You should also discuss the issue with your supervisor if you believe the colleague's behavior may violate our Code of Conduct - for example intentionally violating your organization's timekeeping and payroll policies.
- 
- Q** I work in the Human Resources department. Lately I've been finding confidential colleague information, including payroll data and other personal information, left behind in the copy room that's used by other departments on our floor. What should I do?
- A** Protecting the privacy and security of colleague information is very important. Take the documents you've found to your supervisor or a higher-level manager in your department so they can determine the most appropriate way to follow-up with staff on this issue.

### Relationships with Suppliers and Other Business Partners

Colleagues and others working on behalf of Trinity Health are expected to maintain appropriate business relationships with suppliers, independent contractors, consultants, and others providing goods or services to our health care ministry. Such relationships must be free from conflicts of interest and consistent with applicable laws and good business practices. Our Core Value of Stewardship calls us to be faithful stewards of the human, financial, and natural resources entrusted to us. The cost of gifts, entertainment, and meals provided by suppliers and other business partners is ultimately borne in the cost of products and services purchased by Trinity Health. The following guidelines for interactions with suppliers and other business partners apply to all who work in Trinity Health (please note the organization, department or unit where you work may follow more restrictive policies which you are expected to follow):

- Do not accept gifts, entertainment, meals, or other incentives given for the purpose of influencing a purchasing or contracting decision, or that otherwise could appear to improperly influence decisions you make involving Trinity Health.
- Do not accept gifts, entertainment, meals, or other incentives given for the purpose of encouraging or rewarding patient referrals.
- Do not offer, accept, or solicit gifts, meals, entertainment or other incentives that could be perceived as a bribe, payoff, deal or any other attempt to gain a competitive advantage.
- Do not accept cash or items redeemable for cash such as checks, gift cards, etc.
- Occasional non-cash items of nominal value (e.g. pens, note pads, coffee mugs) may be accepted, but are generally discouraged.

- You should politely decline gifts offered by suppliers or other business partners that involve entertainment or social activities such as free or discounted tickets to sporting events, theatre or concert events, golf outings, travel and lodging, etc. You may attend an entertainment or social event with a supplier or other business partner provided you, not the supplier, pay your own cost (e.g., the face value of a sporting event ticket) to attend such events. Any exceptions to this policy require the advance approval of your supervisor and your organization's Integrity & Compliance Officer.
- Suppliers and other business partners may occasionally donate to charitable fundraising events that benefit Trinity Health and affiliated organizations (e.g., foundation). These events may include social or entertainment activities (e.g., golf or dinner) where Trinity Health colleagues are invited to participate with a supplier or business partner. You may accept such invitations provided you obtain the advance approval of your supervisor. Trinity Health colleagues are encouraged to make a personal donation to the fundraiser equal to the value of the event to an individual participant, although doing so is not required.
- You may accept invitations to attend local or out-of-town programs, workshops, seminars and conferences sponsored by a supplier or other business partner that have a legitimate educational purpose or otherwise support a Trinity Health business objective (e.g., product training) provided such events are infrequent (e.g., no more than once annually), you obtain the approval of your supervisor in advance, and Trinity Health, not the supplier, pays for any related travel and overnight lodging costs you incur. Any exceptions to this policy require the advance approval of your supervisor and your organization's Integrity & Compliance Officer.
- In all cases you should use common sense and good judgment in accepting or refusing gifts of any kind. Consider all the facts and circumstances and discuss any questions you have with your supervisor or Integrity & Compliance Officer. There may be circumstances when accepting a gift that technically meets the guidelines specified above should be declined.
- Occasional (e.g., no more than 1-2 times annually) perishable or consumable items (e.g., flowers, fruit, candies, etc.) of nominal value given to a department or unit and shared with co-workers may be accepted, but are generally discouraged.

In general, Trinity Health discourages colleagues from accepting meals and refreshments paid by suppliers or other business partners. An occasional meal or refreshments may be accepted provided the following requirements are met:

- Such events are infrequent, which, as a general rule, means no more than 1-2 times per year.
- The event immediately precedes or follows a legitimate business meeting (e.g. discussion of business topics involving Trinity Health).
- The setting for the meal is appropriate to discussing business (e.g. office or restaurant) and the host is present.
- The supplier or business partner's expense is modest which, as a general rule, means the cost of meals and refreshments does not exceed \$50.
- Trinity Health does not incur additional travel or overnight lodging costs as a result of your participation in the meal.

The above requirements do not apply to meals and refreshments provided in connection with a conference or other educational program sponsored by a supplier, consultant or business partner for the benefit of all attendees.



...use common sense and good judgment in accepting or refusing gifts of any kind.

### Fundraising

As a tax-exempt charitable organization, Trinity Health may solicit charitable contributions to support our health care ministry. Trinity Health policy restricts the solicitation of gifts from suppliers and other business partners to only those colleagues who work in foundations or specific fundraising departments. Fundraising requests are not to be made of suppliers and other business partners in exchange for promises of Trinity Health business or to influence current or future business decisions.

### Conflicts of Interest

You are expected to avoid situations or circumstance that could place you in conflict with the interests of Trinity Health. A conflict of interest may exist whenever your outside activities, personal financial interests or relationships interfere, or could appear to interfere, with your judgment or decision-making in your position or role with Trinity Health. In addition to gifts, entertainment and meals, there are a few other areas which you should be aware of that can create potential conflicts of interest:

- **Outside Employment:** You should discuss with and obtain the approval of your supervisor before accepting an offer to work for any organization that conducts business with or competes with Trinity Health.
- **Endorsements and Testimonials:** Do not make any endorsements or testimonials for suppliers, vendors, trade or professional organizations conducting business with Trinity Health without discussing and obtaining the advance approval of your supervisor and your organization's marketing department.
- **Financial Interests:** It is generally considered to be a conflict of interest to do business with, or recommend that Trinity Health do business with, a company in which you or a family member has a financial interest. Financial interests may include employment or other compensation arrangements, as well as ownership or investment interests (investments in large, publicly-held companies are generally not a concern). Discuss with your supervisor any financial interests you or a family member may have that might present a conflict of interest with your job responsibilities in Trinity Health.
- **Service on Outside Boards:** Trinity Health colleagues are encouraged to actively participate in charitable and civic organizations that benefit our communities. Discuss with and obtain the approval of your supervisor before accepting an invitation to join a board of any organization that may create a conflict of interest with your job responsibilities at Trinity Health.

When addressing conflicts of interest, remember that appearances do count! Discuss any questions you have regarding potential conflicts of interest with your immediate supervisor or contact your organization's Integrity & Compliance Officer.

## Questions & Answers

- Q** Suppliers frequently visit our office and bring in new products for us to sample. They always want to provide lunches for the office staff. Is it appropriate to accept free lunches from suppliers?
- A** In general, Trinity Health discourages the acceptance of meals and refreshments paid or provided by suppliers or other business partners. Any meal provided must be infrequent, connected to a legitimate business purpose, such as education or product demonstration, and must take place in an appropriate business setting with the supplier host present. Take-out food (“dine and dash”) delivered to office staff by a supplier or meals that are not connected with a legitimate educational or business purpose are prohibited. Likewise, meals may only be provided for staff attending the education or product demonstration and the cost of any meals provided must be modest. Consult your organization’s local policies on acceptance of supplier provided meals which may be more restrictive.
- 
- Q** The firm my organization uses for marketing and advertising services offered me two courtside tickets to a professional basketball game. Can I accept the tickets?
- A** You should politely decline the acceptance of gifts that involve social or entertainment activities such as free or discounted tickets to sporting events. You may accept the tickets only if you personally pay the supplier the cost of the tickets.
- 
- Q** A supplier recently called seeking my input on a new product that is under development. The supplier will be holding an out-of-town meeting and has asked me to attend. The supplier is willing to pay my airfare, hotel and meals for two days, as well as pay for my time to attend the meeting. Can I accept the invitation?
- A** Trinity Health policy prohibits the acceptance of supplier-paid compensation and expenses for travel, lodging and meals. If you are in a position of decision-making regarding the purchase or use of the supplier’s products in Trinity Health, your participation in the meeting and acceptance of compensation and expenses paid by the supplier could be viewed as potentially influencing your future decision-making. You and your supervisor should discuss the purpose of the meeting and the potential expectation of the supplier as a result of your participation. Any exceptions require the advance approval of your supervisor and your organization’s Integrity & Compliance Officer.
- 
- Q** Suppliers frequently send gifts of fruit or candies to our department during the holidays. Can we accept such gifts or must they be returned?
- A** Although discouraged, you may accept occasional gifts (e.g. no more than 1-2 times annually) of perishable or consumable gifts from suppliers that are broadly shared among a department or with co-workers.
- 
- Q** I work full-time, 12 hour shifts, and would like to get some extra hours of work at another health care provider in the community. Do I have to discuss with my supervisor before I accept another position?
- A** Before you consider an offer to work for a potential competitor of Trinity Health, discuss the situation with your supervisor to make sure there are no potential issues in accepting outside employment that might interfere with your work responsibilities at Trinity Health. This issue is especially important for full-time colleagues.



**Q** I was asked by a professional organization I am a member of to speak at an upcoming educational event. The professional organization has offered to pay my travel expenses and lodging for the day I am scheduled to speak. May I accept the offer?

**A** Yes, Trinity Health colleagues may accept travel expenses and lodging in exchange for professional speaking engagements. However, the expenses should be reimbursed only for the day you are asked to speak. For example, if it's a five-day educational conference and you will only be speaking on the first day, the reimbursed expenses should be for one night's lodging and related travel expenses.

---

**Q** My sister-in-law is a health care industry consultant. Is it okay if I recommend her to work on a consulting project at my organization?

**A** Yes, however you should fully disclose your relationship to anyone in your organization that you recommend your sister-in-law, or her firm, for the project. You should not participate in the hiring decision, nor use your position to influence the outcome of the hiring decision. Also, you must not share any information with your sister-in-law that is confidential or that has not been provided to other prospective suppliers.

---

**Q** I am the point of contact in my organization for a particular supplier. Our organization is conducting a major capital campaign and the supplier recently asked me what amount they should donate because they want to make sure they don't risk losing their Trinity Health contract. What should I say?

**A** You should refer the supplier to your organization's Foundation or fundraising department to discuss appropriate options for contributing to the capital campaign. You should also advise the supplier that the supplier's decision to donate (and how much to donate) to the capital campaign is not a factor in current or future contracting decisions.

---

### Relationships with Regulators and Those Who Pay for Our Services

Federal and state health care programs, such as Medicare and Medicaid, as well as commercial insurance and other third-parties, are responsible for the payment of a significant majority of the health care services we provide to our communities. Trinity Health and other health care organizations are subject to numerous laws and regulations that apply to our operations. These laws and regulations are complex and can be challenging to apply in a rapidly changing health care industry. Nevertheless, Trinity Health is committed to complying with all laws and regulations that apply to our health care ministry. All who work in Trinity Health are expected to:

- Act with honesty and integrity in all activities involving Trinity Health.
- Follow all laws, regulations and Trinity Health policies that apply to your work and ask for assistance if you have questions about how they affect you. See resources available to assist you on pages 26-27.
- 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.
- Respond to surveys conducted by accrediting or external agency surveying organizations with honesty, openness and accurate information. Do not take actions intended to obstruct or mislead an accrediting or external agency survey team.

- Submit accurate and complete cost, quality, safety, tax and other information in all reports filed with federal and state regulatory agencies.
- Do not engage in discussions or make agreements with competitors related to pricing, market strategies, payer strategies, or wages and benefits. Consult with Trinity Health legal counsel on any matters that could implicate antitrust laws.
- Do not contract with, employ, or bill for services rendered by an individual or entity that is excluded or ineligible to participate in federal or state health care programs. Report to Trinity Health if you become excluded, debarred, or ineligible to participate in federal or state health care programs.
- Present only truthful, fully informative, and non-deceptive information in any marketing or advertising activities.
- 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, Institutional Review Board and Trinity Health policies.
- Participate in training and education programs offered by Trinity Health to assist you in understanding laws, regulations and Trinity Health policies that apply to your work.
- Cooperate with and immediately notify your supervisor of any government investigation. Never, under any circumstances, destroy or alter documents or information, including electronic documents, records, or correspondence requested as part of a government investigation. Never lie or make false statements to a government investigator.
- Do not offer gifts or other items of value to a government representative.
- Do not contribute – or direct the contribution of – Trinity Health funds to any political candidate, political party, or political campaign.

### Do I Have a Relationship with the Government?

While many federal and state laws and regulations that apply to Trinity Health may not affect the work you do directly, it's important for you to be aware of certain laws and regulations and how they affect our health care ministry.

### Fraud and Abuse

There are many federal and state laws designed to protect government health care programs, such as Medicare and Medicaid, as well as commercial insurance and other third-parties that pay for the health care services we deliver. These Fraud and Abuse laws generally prohibit the following:

- Submitting inaccurate or misleading claims for services provided.
- Submitting claims for services not provided.
- Submitting claims for medically unnecessary services or services not covered by the payer.
- Making false statements or representations to obtain payment for services or to gain participation in a health care program.
- Concealing or improperly avoiding an obligation to repay a health care program.
- Offering or paying money, goods, or anything of value to encourage or reward the referral of patients to a health care provider.

### Relationships with Physicians and Other Referral Sources

If your work responsibilities include interactions with physicians or other persons or organizations that may refer patients or residents to Trinity Health facilities, it is important that you are aware of the requirements of laws and regulations that apply to these relationships. These include the federal Anti-Kickback Law, Stark Law, laws that apply to tax-exempt organizations, and similar state laws. Trinity Health has established specific policies and procedures addressing financial relationships with physicians and other referral sources. These policies are based on two key principles that apply to all such relationships:

- We do not pay for referrals: Patient and resident referrals and admissions are based solely on an individual's medical needs and our ability to render the needed services. No one in Trinity Health is allowed to pay or offer payment to anyone for the referral of patients or residents.
- We do not accept payments for referrals: No one in Trinity Health is permitted to solicit or receive anything of value, directly or indirectly, in exchange for the referral of patients or residents to a Trinity Health facility. We do not take into account the value or volume of referrals made to us when making referrals to other health care providers.

Failure to properly structure and administer financial relationships with physicians and other referral sources can result in unintended violations of the law and significant legal and financial consequences to Trinity Health, and potentially to the individuals involved. Please contact your Trinity Health legal department or your Integrity & Compliance Officer if you have questions as to how these laws and regulations apply to your work responsibilities or to obtain additional information on Trinity Health policies and procedures.

### Tax-Exemption

A vast majority of Trinity Health organizations are not-for-profit, tax-exempt organizations operated exclusively for religious or charitable purposes. Care of those who are poor, benefits provided to our communities, and medical education programs are examples of the types of activities that support our charitable purpose. As a tax-exempt organization, Trinity Health is required to follow a number of additional laws and regulations that generally prohibit the following:

- The improper use of Trinity Health assets for the private benefit or interests of any individual in a position of substantial influence over the organization.
- Paying more than "fair market value" for goods and services, or providing goods and services to others at less than fair market value unless allowed by law.
- Direct or indirect campaigning for or against the election of any candidate for public office, including the donation of Trinity Health funds to any political candidate, party organization or committee.
- Engagement in substantial lobbying activities. Trinity Health may comment on legislation or regulations under consideration and may also take public positions on issues relating to our operations and mission.

### 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 to a federal health care program. "Knowingly" includes having actual knowledge that a claim or record is false or acting with "reckless disregard" as to whether a claim is false. In addition to the federal law, most states in which Trinity Health operates have adopted similar state false claims laws.

The False Claims Act and similar state laws allow individuals with original information concerning fraudulent activities involving government programs to file a lawsuit on behalf of the government and, if successful, to receive a portion of the recoveries received by the government.

Penalties for violating the False Claims Act are significant. Financial penalties can be as much as three times the amount of the claims plus fines of \$11,000 - \$22,000 per claim. Courts can also impose criminal penalties against individuals and organizations for willful violations of the False Claims Act. The False Claims Act and similar state laws protect employees, contractors

and agents from being fired, demoted, threatened or harassed by an employer for filing a False Claims Act lawsuit.

Trinity Health prohibits colleagues, agents or contractors from knowingly presenting or causing to be presented claims for payment which are false, fictitious or fraudulent. Please contact your ministry's Integrity & Compliance Officer if you have any questions regarding the False Claims Act.

## Questions & Answers

- Q** While preparing claims for submission to Medicare, I believe there are charges for some services that are inappropriate based on Medicare's billing rules. Should I submit the claims anyway and let Medicare determine if the charges are appropriate?
- A** It is inappropriate to submit claims to Medicare, or any other payers, that are known to be inaccurate or that do not meet the payer's requirements. If you believe the charges are inappropriate, you should notify your supervisor of your concerns. If the issue is occurring on a regular basis, you and your supervisor should discuss the issue with appropriate management responsible for the department or area involved so that actions may be taken to prevent the errors from occurring in the future.
- 
- Q** My organization was recently notified by Medicare of some billing errors. The claims at issue have been corrected. However, we haven't changed our practices that caused the errors to occur in the first place. Do I have a responsibility to tell someone?
- A** Yes. All of us have a responsibility to seek answers to our questions and concerns. Speak with your supervisor to make sure you fully understand the situation. If you are still concerned that appropriate actions have not been taken to resolve the billing issues, contact your Integrity & Compliance Officer or the Integrity & Compliance Line.
- 
- Q** In my work area we refer many patients to local home care agencies for at-home services. One of the local home care agencies recently offered to give us gift certificates in appreciation for referring patients to their agency. Is this allowed?
- A** No. Federal laws strictly prohibit health care providers and their employees from offering or accepting anything of value in exchange for the referral of Medicare and Medicaid patients. You should discuss this matter with a senior-level manager in your organization or your Integrity & Compliance Officer so that appropriate follow-up action can be taken with the home care agency.
- 
- Q** A government investigator tried to reach me at my home. She left a note asking me to call her to discuss my organization's billing practices. What should I do?
- A** It is the policy of Trinity Health to cooperate and respond appropriately to any lawful government investigation. It is appropriate for you to ask the government investigator for official identification such as a badge or picture ID. You have the right to decide whether or not to meet with the investigator and may inform the investigator that you only wish to respond to questions at work in the presence of your supervisor or an attorney representing Trinity Health. In all situations you have the right to consult with legal counsel before making a decision. If you choose to meet with the investigator, you must always be truthful. Never lie or attempt to deceive a state or federal government official. Do not destroy any documents that you think the investigator may be seeking or that you believe could be

relevant to the investigation. Regardless of your decision, if contacted you are strongly encouraged to immediately notify your supervisor, your Integrity & Compliance Officer or your organization's legal department.

---

**Q** My job responsibilities require me to frequently interact with physicians on the medical staff. I understand there are specific laws and regulations that impact what I can and can't do with physicians. What are the rules and where can I find more information?

**A** You are correct that there are several federal and state laws and regulations that impact relationships with physicians and other referral sources. These include the Anti-Kickback Law, the Stark Law, and laws applicable to tax-exempt organizations like Trinity Health. In general, it is inappropriate to offer or give gifts, gratuities or anything of economic value to a physician in exchange for referring patients. All financial arrangements with physicians, such as employment, administrative and professional service agreements, office and equipment leases, and asset purchases and sales, must be properly structured and carefully administered to ensure compliance with these laws and regulations. You should contact your Integrity & Compliance Officer or your organization's legal department to learn more about our policies and to discuss any questions you have.

---

**Q** A colleague recently posted a notice on our department's bulletin board asking other colleagues to join him in forming a group to support a candidate for the city council. Is this appropriate?

**A** No. Using Trinity Health's resources, such as bulletin boards, emails, and telephone systems, to participate or encourage others to participate in political activities on behalf of specific candidates for office or specific political parties is not allowed and could jeopardize the organization's tax-exempt status. You should discuss this matter with your supervisor or contact your Integrity & Compliance Officer.

---

**Q** A friend of mine works in the Human Resources department at another hospital in our community. He wants to do a survey of area health care salaries. May I share our organization's salary information with him?

**A** No. There are strict laws that regulate competition, such as antitrust laws. Sharing salary information may appear to be an effort to fix wages and limit competition in the marketplace. You should notify your Integrity & Compliance Officer or your organization's legal department so that appropriate follow-up can take place.

---

### Relationships with Trinity Health and Communities We Serve

Each of us also has a relationship with the Trinity Health organization where we work and to the broader communities we serve. As with other relationships described herein, there are certain expectations and commitments of both parties to the relationship. All who work in Trinity Health are expected to:

- Represent your organization honestly and ethically in all your work activities and relationships on behalf of Trinity Health.
- Properly use and protect Trinity Health resources including materials and supplies, equipment, staff time and talents, and financial assets.
- Obtain your supervisor's approval before participating in any non-Trinity Health activity during regular work hours or before using Trinity Health equipment, supplies, materials or services for any activity unrelated to your work at Trinity Health.



- Use good judgment and follow your organization's policies and procedures for business travel and expense reporting. You should not incur a financial loss or gain as a result of appropriate business travel.
- Prepare and maintain accurate and complete financial records of your activities on behalf of Trinity Health, including accounting, budgeting, time and attendance, expense and other financial data and information.
- Never give false or misleading information to anyone doing business with Trinity Health or competing with Trinity Health.
- Properly safeguard and retain all Trinity Health documents and records in all forms, including paper documents as well as electronic records, in accordance with Trinity Health and your organization's record retention policies.
- Properly use and protect the confidentiality of all business or other information you use or encounter in your work at Trinity Health.
- Follow all Trinity Health policies governing the use of information and communication systems including access and appropriate use, limitations on personal use, and protecting the privacy and security of data and information.
- Respect the environment and follow all environmental laws, including operating of facilities with the necessary permits, approvals and controls. Follow your organization's policies for the handling and disposal of hazardous materials and infectious waste.
- Maintain appropriate licenses, certifications and other credentials required of your position.
- Commit to your ongoing learning and development through completion of education and training programs assigned by your organization.
- Cooperate fully in any audits or investigations requiring your assistance and answer questions honestly and completely.

A relationship is not a one-way street. In recognition of your commitment, you should also expect Trinity Health will:

- Treat you with honesty, dignity and respect.
- Provide you a safe and supportive work environment free of harassment, intimidation or violence.
- Provide encouragement and support for your continued learning and development.
- Provide resources for your training and development, including assisting you in understanding the various laws, regulations and Trinity Health policies that apply to your work.

- Provide a respectful work environment that allows you to freely ask questions, seek clarification when needed, and raise issues and concerns in good faith without fear of retaliation or harassment.
- Respond to your requests for information or assistance in a timely and supportive manner.

### Confidential and Proprietary Information

We treat information about Trinity Health's business operations as confidential and proprietary. This means we do not share information about Trinity Health's operations or business strategies with the public. We take great care to share confidential and proprietary information only with individuals that have a need to know the information. Confidential information includes virtually any information not publicly known including individually identifiable patient, resident, participant or member information, personnel data, lists, clinical information and quality data, financial reports, pricing and cost data, information related to affiliations, mergers, acquisitions and divestitures, strategic plans, marketing strategies, and supplier information and data.

Confidential and proprietary information is found in many different forms including paper records, electronic records, verbal and written communications, and various forms of media. The inappropriate sharing of this information can harm our patients, residents, and others, and result in significant damage to Trinity Health's reputation.

### Use of Electronic Media

All communication systems provided by Trinity Health, including computers, email, instant messaging, intranet, Internet access, telephone and voice mail systems are the property of Trinity Health and are to be used primarily for business purposes. Limited personal use of such systems is permitted. However, Trinity Health reserves the right to monitor all aspects of the usage of these systems for appropriateness and to ensure such usage supports the business goals of the organization. Users should not assume any of their interactions and communications when using these systems are private. Users are responsible for following all Trinity Health policies regarding the appropriate access, use and security of electronic media in the workplace.

### Use of Social Media

As a values-based organization, Trinity Health expects all of who work in our health care ministry to exercise good judgment and personal responsibility whenever using social media such as Facebook™, Twitter™, LinkedIn™ and other sites. Please keep in the mind the following:

- Do not post any Trinity Health confidential or proprietary information to a social media site. This includes photographs and other information regarding patients or residents.
- Do not reference or otherwise associate Trinity Health when using social media to solicit for, endorse or promote outside business ventures, political candidates or campaigns, or religious causes.
- The use of Trinity Health provided devices or communication systems to access the Internet or social media sites to view, post, transmit, download, or distribute threatening or harassing materials, profane, obscene or derogatory materials, or anything that could give rise to a violation of laws or regulations is strictly prohibited.
- Be respectful and professional when using a personal site or account that may identify you as a colleague of Trinity Health.

## Questions & Answers

- Q** There is a colleague in my department who regularly uses the Internet while at work for personal activities. I am not in a position where I'm responsible to "police" other colleagues in my department and their use of work time. What should I do?
- A** You should discuss this matter with your supervisor or a higher-level manager in your department. All colleagues have a responsibility to ensure that resources and assets used each day are substantially devoted to Trinity Health activities. These resources include supplies, materials, equipment and colleague work time. The occasional personal use of technology resources, like the Internet, is allowed if it doesn't interfere with the colleague's work or violate any Trinity Health policies.
- 
- Q** Before coming to work at Trinity Health, I worked for a competitor organization and received information that might help our organization in negotiating more favorable contracts with suppliers. Can I share this information with others in my organization?
- A** No. Do not disclose confidential information you obtained from another job. We may not use this information in any business dealings. Further, it would be unethical for you to share any confidential information you may learn from your employment with Trinity Health with a future employer should you leave the organization.
- 
- Q** A colleague I work with frequently posts updates on Facebook and sometimes will make references to his day at work. Although he never mentions any patient or resident names, he sometimes discusses unusual cases in far more detail than I feel comfortable. Should I be concerned?
- A** Yes. Omitting a patient or resident's name does not make it "okay" to discuss on a social media site such as Facebook. Omitting a name does not guarantee that the person cannot be identified. The uniqueness of the situation alone could allow people to reasonably identify the patient or resident. Disclosure of confidential or sensitive information via social media not only puts our patients and residents at risk, it also constitutes a violation of federal privacy laws which can lead to hefty fines and criminal penalties for both the organization and the colleague who made the posting. You should discuss this matter with your supervisor or contact your organization's Privacy Official for assistance.
- 
- Q** I recently witnessed some unusual activity occurring on the loading dock at my organization. Several shipments of expensive computer equipment delivered to my organization were subsequently picked up by another company and taken away. I questioned my supervisor who gave me an explanation, but the more I think about it, the answer just doesn't seem to make sense. What should I do?
- A** You should discuss the issue with a higher-level manager in your department or contact your Integrity & Compliance Officer. The explanation you received may be correct and there may be nothing inappropriate occurring with the computer equipment. However, when there is something about an answer you receive that bothers you, or just doesn't feel right, it's best to discuss the issue with another member of management in your organization.
- 
- Q** I assist my boss in preparing her expense reimbursement reports. She often submits receipts for meals and entertainment expenses without specifying who was in attendance





Users are responsible for following all Trinity Health policies regarding the appropriate access, use and security of electronic media in the workplace.

and without a description of the business purpose of the meeting. My boss is extremely busy and I don't like to bother her with questions that make it look like I don't trust her. What should I do?

- A** First, make sure you clearly understand the specific documentation policies required for expense reimbursements in your organization. Share these requirements with your boss and explain you want to assist her in ensuring she provides all required documentation for her expense reimbursements. Ultimately she is responsible for the expense reimbursement claims submitted on her behalf. If this approach is not successful, contact a higher level manager in your organization or your organization's Integrity & Compliance Officer for assistance.

This Code of Conduct addresses the more common issues and questions you may encounter in your work in Trinity Health. Working in the health care industry is extremely challenging with complex and frequently changing rules and regulations. As a result, there may be times when the answer to a particular issue or question is not clear. You are responsible for seeking answers to your questions or concerns. Fortunately, there are many resources available to assist you.

### Where to Find Help

**Immediate Supervisor** - This is usually the best place to start in getting answers to your questions. Your supervisor understands the work you do and may already have the information you need or can direct you to the right resource. If your issue or concern involves your immediate supervisor, seek help from one of the other resources listed below.

**A Higher-Level Manager or Leader** – If you are not comfortable discussing the issue with your supervisor or do not agree or are uncomfortable with the answer you receive, discuss the issue with a higher-level manager or leader in your department or organization.

**Human Resources** – Your organization's human resources staff can likely answer many of your questions and assist you in addressing workplace issues and concerns.

**Integrity & Compliance Officer** – Your Integrity & Compliance Officer is responsible for operation of the Integrity & Compliance Program in your organization and is available to assist you in obtaining answers to your questions and concerns.

## RESOURCES TO ASSIST YOU

### Your Organization's Integrity & Compliance Officer



Laurel Baum  
Chief Integrity & Compliance Officer,  
Integrity & Compliance Department  
518-525-6274  
Laurel.E.Baum@trinity-health.org

**Integrity & Compliance Line** – You are encouraged to use one of the resources listed here to address your questions and concerns. However, if you are not comfortable using these resources or if the resources used have not fully resolved your concern, please contact the Trinity Health Integrity & Compliance Line at 866-477-4661. You may also file a report online at [www.mycompliancereport.com](http://www.mycompliancereport.com) using THO as the access code. You may choose to remain anonymous and all reports are treated confidentially. See further information on the Integrity & Compliance Line in the information box.

**Legal** – Contact your organization's legal department when seeking legal advice or guidance on behalf of your organization.

**Mission Department and Local Ethics Committee** – Guidance on matters relating to the Mission and Core Values, the Ethical and Religious Directives for Catholic Health Care Services, pastoral care, advance directives, end of life issues and patient rights are appropriately addressed with your local mission department and/or local ethics committees.

**Medical Staff Office** – If you are a privileged practitioner, you are encouraged to contact your organization's medical staff office to discuss any issues or concerns.

**Privacy and Security Officials** – Contact your organization's privacy and security officials if you have questions or concerns related to the use or protection of personal health information or confidential and proprietary business information.

**Risk Management and Safety** – If you have questions or concerns related to patient care or workplace safety, or are seeking guidance regarding the disclosure of medical errors or adverse events, please contact your local risk management and/or safety departments.

**Patient and Colleague Safety Event Reporting Systems** – Trinity Health organizations have reporting systems designed to assist colleagues, medical staff, and others in reporting “near misses”; errors and other events involving patient care or safety anonymously, if so desired. You should be familiar with the system used to report patient safety events in your organization. Examples include the Voice Organization Incidents, Complaints and Events (VOICE) system and the MIDAS system. All colleague injuries, threats or “near misses” should be reported promptly to the colleague's supervisor and to the workers' compensation claims coordinator, using the Trinity Health Employee Incident Report (THEIR) system, if available, or the standard workers' compensation injury reporting process in effect at your organization.

Trinity Health values your opinions, insight and feedback. The most efficient way to resolve concerns is through the internal resources listed on page 26. If you feel a patient care concern has not be adequately addressed, there are also external reporting options available including The Joint Commission Office of Quality and Patient Safety: email [complaint@jointcommission.org](mailto:complaint@jointcommission.org), Mail One Renaissance Boulevard, Oakbrook Terrace, Illinois 60181. Individual state survey agencies may also be contacted with concerns.

### Obligation to Speak-Up

Trinity Health promotes an environment that encourages all to seek answers to questions and to report issues and concerns. Each Trinity Health colleague has a right and a duty to report any activity he or she believes may violate applicable laws, regulations, professional standards of practice, or this Code of Conduct using one or more of the resources listed herein. If the matter has previously been reported and the colleague believes it has not been given sufficient attention, he or she should report the matter to a higher level of management, their organization's Integrity & Compliance Officer, or the Integrity & Compliance Line.

### Non-Retaliation Policy

Trinity Health has a policy of "zero tolerance" for any form of retaliation against those who report issues and concerns in good faith, including potential violations of our Code of Conduct. Retaliation includes direct as well as indirect actions, or the threat of actions, of supervisors, co-workers, or others.

Retaliation is subject to discipline, up to and including dismissal from employment, suspension of medical staff privileges, or termination of business relationships with Trinity Health, in accordance with Trinity policies and medical staff bylaws, as applicable.

### Acknowledgment Process

All Trinity Health colleagues are required to acknowledge their receipt and review of this Code of Conduct, confirm they understand it represents the mandatory policies of Trinity Health and agree to abide by it. New colleagues are required to do so as a condition of employment and all Trinity Health colleagues are required to participate in annual Code of Conduct training designed to reinforce awareness and understanding of its requirements.

Adherence to and support of our Code of Conduct and participation in related training activities is considered in decisions regarding hiring, promotion and compensation for all Trinity Health colleagues.

### Integrity & Compliance Line

866-477-4661 or [www.mycompliancereport.com](http://www.mycompliancereport.com)

Access code = THO

The Integrity & Compliance Line is staffed 24 hours a day, seven days a week by an outside organization on behalf of Trinity Health. When you call the Integrity & Compliance Line, you will speak with an individual trained to listen to your questions and concerns and to gather as much information from you as possible. If you prefer, you may submit your issue online at the website address listed above. When prompted for an access ID, please use THO. Using either method, your report will not be traced or recorded, and the Integrity & Compliance Line does not use caller ID.

When submitting a report through either the Integrity & Compliance Line phone or online system you may choose to remain anonymous. Trinity Health uses every effort to maintain, within the limits of the law, the confidentiality and identity of any individual who reports issues and concerns. Your report will be provided to Trinity Health for review and investigation. When using the phone system to file a report, you will be provided a report identification number for you to check back later on the status and ultimate resolution of your report.

## Acknowledgment and Certification

I acknowledge that I have received a copy of the Trinity Health Code of Conduct and I agree to read it completely. I also agree to discuss any questions or concerns with the Code of Conduct with my supervisor or a higher level manager in my organization. I certify that I will comply with the Code of Conduct and any other policies established by my organization that apply to my role in Trinity Health. I understand it is my responsibility and obligation to report any issues or concerns regarding possible violation of the Code of Conduct. I also understand I may be asked to cooperate in an investigation and agree to do so if asked. I understand that Trinity Health will not retaliate against me for making a report of issues and concerns in good faith.

I understand the Code of Conduct contains standards of behavior I am expected to follow as a condition of my employment in Trinity Health and is not an employment contract. I also understand the standards may be amended, modified or clarified at any time and I that I will receive periodic updates as they may occur.

Please Print

Name: \_\_\_\_\_

Department or Unit: \_\_\_\_\_

Organization: \_\_\_\_\_

Signature: \_\_\_\_\_

Please complete and submit to your training facilitator or Integrity & Compliance Officer. This acknowledgment may also be obtained electronically. Contact Human Resources or your Integrity & Compliance Officer if you have any questions about this process.

## INDEX

<b>A</b>					
Accounting Record	22	False or Frivolous Reports	5	Peer Review Information	10
Advance Directives	7	Family Members	6, 8, 9, 15	Perishable or Consumable Gifts	8, 13, 16
Adverse Events	26	Financial Reporting	23	Personal Health Information	5, 7, 26
Alcohol	10, 12	Foundations	8	Personal Use of Assets	19, 22, 24
Antitrust Laws	17, 21	Fundraising	8, 14, 17	Personnel Actions	10
Appearances	15	<b>G</b>		Policies and Procedures	7, 11, 18, 19, 22
Assets	19, 21, 22, 24	Gifts	8, 13, 14, 14, 16, 18, 21	Political Activity	18, 19, 21, 23
<b>B</b>		Good Judgment	5, 14, 15, 22, 24	Privacy	5, 7, 13, 17, 23, 25, 26
Billing Practices	20, 21	Government Investigator	18, 21	Privacy Official	7, 25, 26
Board Members	15	<b>H</b>		Property	23
Bribery	13	Harassment	5, 10, 12, 23	Proprietary Information	23, 26
Business Information	5, 22, 23, 27	Home Health	20	<b>Q</b>	
Business Strategies	17, 23	Honest Communication	6, 17, 23	Quality	6, 7, 10, 17, 23, 27
<b>C</b>		Hostile Work Environment	10	<b>R</b>	
Campaigns	17, 19, 21, 24	<b>I</b>		Referrals	13, 18, 19, 20, 21
Charitable Purposes	14, 15, 19	Inadequate Supervision	5	Respect	4, 6, 7, 8, 9, 10, 11, 12, 23, 22
Clinical Quality	6, 10, 26	Integrity	3, 6	Retaliation	23, 27
Compassionate Care	3, 9	Integrity & Compliance Officer	26	Right Relationships	6
Competition, Competitors	13, 16, 17, 21, 24	Intimidation	10, 23	Risk Management	8, 26
Confidentiality	17, 22, 23, 24, 25	<b>J</b>		<b>S</b>	
Conflict of Interest	15	Jokes	10, 12	Safety Officer	11
Conflicts with a Colleague	13	Justice	6	Salary, Wages and Benefits	10, 21
Contracts	13, 17, 24	<b>L</b>		Sexual Advances	10
Contributions	14	Leaders, Leadership	4, 5, 12, 26	Sexual Orientation	6, 10, 11, 12
Credentials	23	Lease Arrangements	21	Solicitation	8, 14
<b>D</b>		Legal Department	19, 21, 26	Stewardship	13
Decision-making Capacity	15, 16	Licenses	23	<b>T</b>	
Diligence	5	Lobbying	19	Tax-Exemption	14, 17, 18, 19, 21
Discharge Planning	9	<b>M</b>		Touching	12
Discipline	9, 27	Marital Status	6, 10, 11, 12	Travel and Entertainment	14, 16, 22
Disclosure	8, 15, 25, 26	Medical Errors	8, 26	<b>V</b>	
Discrimination	11	Medical Ethics	7	Values	1, 2, 7, 22, 25
Drugs	10, 11	Medical Records	6, 9, 17	<b>S</b>	
<b>E</b>		Medical Staff	4, 5, 12, 21, 26, 27	Suppliers	4, 6, 10, 13, 14, 15, 16, 17, 23, 24
Education	14, 16, 18, 19, 23	Medicare and Medicaid	8, 17, 18, 20	<b>W</b>	
Emergency Treatment (EMTALA)	6, 8	Misleading Information	18, 22	Waste	22
End of Life Issues	7, 26	Mission	3, 4, 6, 8, 9, 26		
Entertainment	13, 14, 15, 16, 25	<b>N</b>			
Environment and Safety	10, 11, 23	National Origin	6, 10, 11		
Equipment	21, 22, 24, 25	<b>P</b>			
Ethical and Religious Directives	7, 8, 26	Palliative Care	9		
Expense Reporting	14, 16, 23, 25	Participation on Outside Boards	13		
<b>F</b>		Patients/Residents/Participants	3, 6, 7, 8, 9, 10, 11, 12, 13, 18, 20, 21, 23, 24, 23		
Fair Market Value	19	Patient Rights	26		
False Claims Act	19				

