

*Integrity...*

Right from the

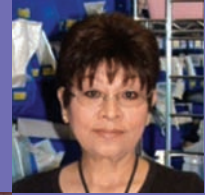
*Heart*

Integrity Standards

About the cover...

As a faith-based and mission-focused organization, it is important to understand that everything Centura does comes out of the desire to practice ideals defined by *integrity*. Associates feel deeply their responsibility to provide a superior patient and resident experience. This can only be accomplished through a very personal investment in and an enthusiasm for their work, a consistent demonstration of compassion for all people and a commitment to doing what is right. As the cover portrays, each of us are part of ensuring “compliance” through our own personal behavior as *Integrity IS.....Right From The Heart*.

C E N T U R A   H E A L T H



# Centura Health Integrity Standards

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## **Mission Statement**

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We extend the healing ministry of Christ by caring for those who are ill and by nurturing the health of the people in our communities.

## **Organization Values**

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The ministry of Jesus Christ urges us to actualize these core values in our interactions with one another and those we serve.

**INTEGRITY.** Honesty, directness, and respect for commitments made.

**STEWARDSHIP.** Respectful use of all natural, human, and financial resources.

**SPIRITUALITY.** Acknowledgment of the central role of spirituality in facilitating mental, physical, and emotional health.

**IMAGINATION.** Creativity and innovation in all we do.

**RESPECT.** Respect for all persons and for our Christian identity, heritage, and missions of our sponsoring organizations.

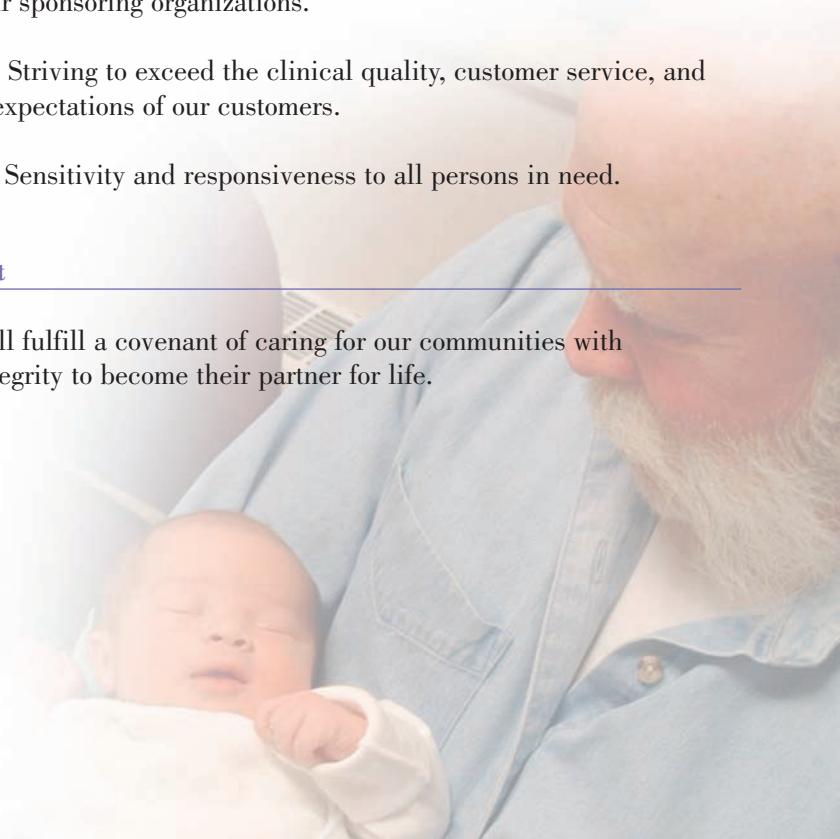
**EXCELLENCE.** Striving to exceed the clinical quality, customer service, and cost performance expectations of our customers.

**COMPASSION.** Sensitivity and responsiveness to all persons in need.

## **Vision Statement**

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Centura Health will fulfill a covenant of caring for our communities with excellence and integrity to become their partner for life.





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## A Message for Centura Health Workforce

Dear Centura Health Workforce Member:

Centura Health and its sponsors, Adventist Health System and Catholic Health Initiatives, are committed to conducting our affairs in accordance with the words and deeds of Jesus Christ. Based on this commitment to our Christian heritage and values, the mission of Centura Health is to contribute to the health and well-being of the communities we serve. Everyone who works with us is critical to the promotion and continuation of this faith tradition.

We believe that the mission and core values of Centura Health distinguish us among other providers of health services. It is our goal to accomplish our mission in collaboration with partners who share our same vision and values. The ministry of Jesus Christ urges us to apply our core values in our interactions with one another and those we serve. Our core value of *Integrity* calls us to interact with honesty, directness and respect. Our core value of *Stewardship* calls us to be responsible stewards of natural, human, and financial resources as well as our reputation. Each of us has a responsibility to those we serve to act ethically, professionally and responsibly.

As we attend to the activities needed to fulfill our mission, legal and ethical issues will continue to challenge us. However, we must meet these challenges with uncompromising integrity and commitment to our core values. Our patients and communities rely on us to act responsibly, and our continued success depends on it.

To attain the highest level of legal and regulatory compliance and as an expression of our values, Centura Health has established a formalized Centura Corporate Responsibility Program. As the foundation of the Centura Corporate Responsibility Program, the Centura Board of Trustees supports and has adopted the *Integrity Standards* (Standards) included in this booklet. These standards apply to all members of the Board of Trustees and its committees and officers, associates, volunteers, physicians and all others who interact with Centura Health (Centura), together this is the “you” we speak to throughout this booklet. These Standards are designed to provide guidance on how to conduct business both ethically and responsibly; however, they do not cover every situation you may encounter. Instead, they provide guidelines on acceptable and ethical business practice. Specifically, the standards are designed to ensure that all individuals working with Centura Health understand their personal responsibility for complying with the basic legal principles and standards of behavior expected in the workplace.



We count on each of you to familiarize yourself with, adhere to and apply the standards defined in this booklet to your work with Centura Health. We also encourage you to seek clarification on any of the standards that are unclear to you. As part of the Centura Corporate Responsibility Program and because this program is so important to assure exemplary performance in all that we do, ongoing training will be provided to you. Each of you will be required to participate in the training and sign a statement affirming your knowledge and understanding of Centura Health's Corporate Responsibility Program and the Integrity Standards.

The Centura Corporate Responsibility Program will continue to evolve from year to year. As we develop and refine the Program, your input, ideas and contributions will be key to its success and effectiveness. We encourage you to offer your suggestions on how this program can better serve you and our communities. We thank each of you for being a part of the Centura Health family and taking the time from your busy schedule to gain an understanding of Centura Health's commitment to its Corporate Responsibility Program. We look forward to continuing our important work together.





## Introduction to Centura Health's Corporate Responsibility Program

As a health care system founded on the mission, values and ministry of Jesus Christ, Centura Health (Centura) is committed to high standards of ethical, professional and legal business practices. This commitment is rooted in the long-standing history of our sponsors and our health care facilities who, for years, have continued to provide quality care and services to the communities we serve.

As a board or committee member, officer, associate, volunteer, physician or other associated individual, you are essential in helping Centura fulfill its mission and core values and provide a fundamental link to Centura's success for maintaining high standards of ethical integrity. To fully communicate our commitment to uncompromising integrity, we have developed the Centura Corporate Responsibility Program supported by the Integrity Standards as reflected in this booklet. The Program is founded on our core values and is lived through the adherence to the following overall standards:

- Create a workplace that fosters community and an ethical culture, respects the inherent dignity of every person, promotes your participation and encourages safety and well-being.
- Exercise good faith and honesty in all dealings and transactions.
- Exercise responsible stewardship of our natural, human and financial resources as well as our reputation.
- Maintain regulatory and legal compliance.
- Avoid conflicts of interest or the appearance of a conflict.
- Maintain and protect the confidentiality of patient, associate and organizational information.
- Maintain high levels of knowledge and skill among all who serve in order to provide the greatest health care experience.

Centura has many programs already in place to promote excellence, quality and responsible conduct. These programs are the building blocks of the Centura Corporate Responsibility Program and to the Integrity Standards defined in this booklet. The Integrity Standards are an expansion of the Associate Principles and their requirements are included herein. This booklet provides guidance on policies and procedures that are essential for the success of the Centura Corporate Responsibility Program and you. It is important for you to become familiar with them and to understand how they relate to you in your service to Centura Health.



## INTEGRITY STANDARDS

Centura Health, which includes all service lines, individuals, functions, etc. and collectively known as Centura, is committed to high standards of business ethics and integrity that reflect our Christian heritage and values. Each of us has a duty to act in a manner consistent with Centura's mission and core values. The following standards provide general guidance to assist you in complying with applicable laws and fostering an environment that promotes and encourages values-based business practices and high standards for ethical behavior.

Please note the items/wording reflected in bold letters, indicates there is an associated Q&A for that item or issue.

### INTEGRITY STANDARD 1: FOSTER AN ETHICAL CULTURE

We promote a workplace climate that values the uniqueness of individuals. We believe associates, physicians, volunteers, vendors and other business sources (collectively called "you") should feel valued, respected, listened to, responded to, satisfied and encouraged. We expect you to represent our organization accurately and honestly.

The following **Integrity Standards** ensure that our activities reflect high levels of integrity and ethical behavior, showing that Centura values ethical decision-making as our normal business practice.

#### *Honest Communication*

We expect you to communicate with honesty. This includes honesty with co-workers and those we serve. This also means that our marketing and advertising accurately explains our services, level of licensure and accreditation.

#### *Cooperation With Governmental Agencies*

You should cooperate with reasonable demands made in a federal, state or local government investigation. You are responsible for protecting the legal rights of Centura and other business associates.

Centura's Corporate Responsibility Department (an oversight department for the Centura Corporate Responsibility Program) or Legal Department should be informed of all notifications of a violation or citation alleging a violation from a governmental regulatory agency. The person receiving the request for information (subpoena, affidavit, warrant, etc.) from any regulatory agency should direct the request to Centura's Legal Department for accurate and timely response (see contact list in back of booklet).



When calling the Legal Department, notify the person taking the call that you are calling concerning a potential government investigation. The Legal Department will instruct you about how to respond. Also, see Centura's policy Responding to Government Investigations for more information on how to deal with government investigators.

**Q • I received a telephone call from someone who said they were a government investigator. The person asked me about our hospital's EMTALA policies and said an investigator would be coming to our hospital in the next few weeks. I did not give the person any information, but what should I do if an investigator comes to my department?**

**A •** First, you were right not to give any information over the telephone because you could not verify the caller's identity.

The answer to the question of what to do when the investigator comes to your department depends on whether the investigator has a court order/subpoena or not. If the investigator does not have a court order/subpoena, you are right not to give him/her any information. If he/she does have a court order/subpoena, get and make a copy of the document and contact your manager, Facility Corporate Responsibility Officer, Centura Corporate Responsibility Department and/or Legal Department.

It is Centura's policy to respond appropriately to all government investigations and reasonable demands by investigators. Generally, this means that we will produce all non-privileged (vs. attorney-client and/or quality improvement privileged information), relevant information requested, if the request is reasonable in scope (e.g. time period and/or identification of specific issue), time and expense.

If an investigator or anyone else comes to your department and starts inquiring about the organization's policies, you should ask the investigator for identification. You should then contact your manager and/or Facility Corporate Responsibility Officer, Centura Corporate Responsibility Department and/or the Legal Department. A representative of the Legal Department will instruct you on how to proceed.

Generally, without a court order/subpoena present, you have no obligation to speak to an investigator. You are free to speak with the investigator, if you choose, but you have the right to determine the time, place, and duration of the discussion. In addition, you have the right to have legal counsel present. If asked, you may choose to sign a written statement, however, you may also choose to refuse to sign



such an agreement. In all interactions with the government, you should always remember to tell the truth at all times.

If the investigator does have a subpoena, we must respond to it or challenge it before a judge. Accordingly, in the event an investigator produces a subpoena in the workplace, you should comply with the investigator's request, but IMMEDIATELY contact your manager, the Legal Department and/or the Centura Corporate Responsibility Department. In any situation you should make copies of all documents provided to the investigator and take detailed notes of his or her activities.

**Q** ● **A woman who said she was with Medicare came to my home. She said that I had to answer her questions because she represented the government. I refused to talk with her and asked her to leave. I tried to call a lawyer but his office was closed. What should I do if this happens again?**

**A** ● It is your right to have an attorney present when being questioned by a government agent or any legal representative. It is always appropriate to ask for identification before responding to questions or providing information. If this occurs again, you may ask for the person's name and the agency he or she represents and refer them to your facility administrator or Facility Corporate Responsibility Officer. You are also encouraged to notify the Centura Corporate Responsibility Department and/or the Legal Department as soon as possible.

**Q** ● **An IRS agent spent several days in our facility conducting an investigation. Some of us got to know him quite well. When the agent completed his investigation, we took him to lunch to express our appreciation of his work. Was that appropriate?**

**A** ● No, you should not provide courtesies such as this to any governmental agent. You or your manager must immediately report this incident following the guidelines on how to report concerns. Although, you were only being friendly, this might be construed as a bribe and is a violation of the rules under which government official's work.

### *Credentials/Provider Qualifications*

We maintain our ethical culture by hiring, promoting and contracting with appropriately licensed and appropriately credentialed individuals who provide direct patient care at Centura facilities. These individuals are required to perform the duties of their position within their scope of authority. Centura may not hire an individual or Business Source that has been convicted of a health care related crime (defined in 42 U.S.C. 1320a-7(1)). Centura prohibits employment of, or doing business with, individuals who are listed by a federal



agency as excluded or otherwise ineligible for participation in federally or state funded health care programs.

### *Exit Interviews*

Centura has processes in place to query individuals terminating service with Centura. These queries include asking whether the associate has ever identified and reported any workplace problems. It is also the responsibility of each of you who leaves the organization to conduct an exit interview with human resources in order to help identify and resolve workplace problems and increase overall satisfaction and retention. Exit interviews are another vehicle that provides Centura the means to shape and improve policies and troubleshoot problems in the workplace. No retaliatory action will be taken against associates who, in good faith, report situations during an exit interview they believe are contrary to our Integrity Standards.

## **INTEGRITY STANDARD 2: PROTECT OUR ASSETS**

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We are committed to providing an environment conducive to wise and respectful decision making and encouraging the responsible utilization of resources as well as our name. You are responsible for protecting these assets by making careful decisions about how our human, material and monetary resources are used and ensuring that the use of our assets supports our healing ministry.

### *Internal Controls*

Centura is committed to providing accurate and truthful information in all transactions. This commitment is reinforced by internal control standards and procedures developed to ensure that assets are protected and used in accordance with their intended purpose, you act within the authority you are given and that financial records and reports are accurate and reliable.

### *Centura Assets and Financial Information*

You share responsibility for safeguarding Centura assets and accurately reporting Centura's financial position. You are responsible for ensuring that accounting records, time reports, purchase and expense requests and other financial data you prepare are accurate, consistent with Centura's business purpose, appropriately approved, and representative of the relevant facts and true nature of the transaction. You are responsible for understanding and staying within the limits of your purchase and contracting authority. If you are unclear of what authority you have to commit funds on behalf of Centura, please contact your supervisor, administrator or appropriate finance representative for a copy of Centura policies defining your approval authority.

Resources purchased or leased by Centura are intended to be used solely for business purposes. Private use of Centura's assets and resources for personal



benefit or gain is prohibited. Destruction of Centura property is prohibited unless performed in compliance with the **Record Retention Policy** or other applicable document destruction policy. You may not insert, modify or delete any software used by Centura or perform any other act for personal benefit or to the detriment of Centura.

### *Cost Reports*

Centura participates in federally funded health care programs and is required to provide documentation of all costs of operation. Centura is committed to complying with Federal and state laws and regulations applicable to cost reporting. Information included in any cost report must have supporting and accurate documentation to assure that the cost report payment is determined correctly. If you are aware of or have reason to believe that cost report information is not correct or the documentation is inadequate, you must notify the Centura Reimbursement Director or Facility Corporate Responsibility Officer or Centura VP, Corporate Responsibility Officer. If you are uncomfortable reporting to these individuals, you may report through the Integrity Helpline.

### *Record Retention*

All Centura records (clinical, financial and employment) will be stored properly in accordance with the guidelines defined in the **Centura Record Retention Policy**. You are encouraged to request a copy of this policy from your administrator, manager, Facility Corporate Responsibility Officer, Centura Corporate Responsibility Department or Centura's Legal Department if you need this information.

## **INTEGRITY STANDARD 3: ADHERE TO REGULATORY COMPLIANCE**

We are committed to protecting the integrity of Centura within the marketplace, to include ensuring free enterprise within the marketplace. You are responsible for complying with all applicable regulations, statutes, laws and organizational policies that impact your work.

### *Compliance with Laws and Regulations*

Anyone acting on behalf of Centura is required to comply with all applicable regulations, statutes, laws and organizational policy (collectively referred to as "law"). If questions arise as to the existence or interpretation of any law, you should direct those questions to Centura's Corporate Responsibility Department or Legal Department. You are required to report promptly to appropriate levels of management and/or your Facility Corporate Responsibility Officer any suspected or actual violations of law so that timely appropriate action can be taken.





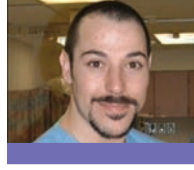
### *Anti-Kickback and Anti-Competition (Antitrust)*

You are prohibited from **soliciting, accepting or offering anything of value in exchange for patient referrals**. Physicians are prohibited from making a referral to any entity in which they or their immediate family members have a financial relationship, unless approved by Centura’s Corporate Responsibility Department and/or Legal Department. Laws and regulatory restrictions in this area are complex; you should contact the Legal Department when any uncertainty exists. Also see Centura’s Frequently Asked Questions on **Gifts From Business Sources** and the **Stark Self-Referral Statute** for additional information.

In addition, you must comply with applicable laws that regulate competition, including antitrust. Under no circumstances may you exchange competitively sensitive information with our competitors, vendors or other business associates. Examples of conduct prohibited by these laws include 1) agreements to fix prices, bid tampering, and collusion with competitors; 2) boycotts and certain exclusive dealing arrangements; and 3) unfair trade practices including bribery, deception and intimidation. You are expected to seek advice from Centura’s Corporate Responsibility Department or Legal Department when confronted with business decisions involving a risk of violation of these laws or when clarification of these laws is needed.

You are prohibited from offering anything of value or enticing patients, residents or other individuals to use or purchase an item or service for which Medicare or Medicaid pays. You are encouraged to contact the Centura Corporate Responsibility Department or Legal Department with any questions, clarifications or concerns involving this matter.

- Q** ● **What are “kickbacks” or “incentives for referrals”?**
- A** ● Giving or receiving gifts, gratuities or anything of value to or from someone who refers an individual, or is in a position to influence referrals in any way, may constitute a kickback. Examples of kickbacks include offering excessive discounts to patients, providing supplies or equipment free of charge, offering gifts to individuals to obtain their business, writing-off accounts receivable without following the guidelines established by policy, offering professional courtesies to physicians to encourage them to refer their patients to our facility, and leasing office space at less than fair market value. For additional guidance see **Guidelines for the Insured/Uninsured**, **Policy on Prompt Pay Discounts** and **Policy on Charity Care**.



**Q** ● A pathologist had cosmetic surgery at our facility and we did not make a record or bill for the services. My supervisor said this was a “Courtesy Visit” and as such the pathologist should not be charged. Are we allowed to do this?

**A** ● This is not allowed. All services performed should be documented and billed. Providing such courtesies to the pathologist exposes the organization and the pathologist to potential legal and tax liabilities.

**Q** ● I am manager of a department, and a group of physicians gives our department a monetary gift at Christmas time. The money is given to me and I share it with the associates in my department, as I deem appropriate. The physicians are contracted with us but I do not have input or influence concerning their contracts. May I accept this gift?

**A** ● No, regardless of whether you have input or influence into the physician’s contract, you should not accept cash donations from anyone nor in any situation. In accordance with the **Conflict of Interest Standards**, you are only allowed to accept nominal gifts. In addition, your gift from physicians may expose the organization to liability. All dealings with physicians should be impartial and fair to prevent the perception of impropriety.

This is a complex area of the law and may result in severe fines and penalties to both the organization and the individual receiving the kickback. Any situations with the potential for, or the perception of, anti-kickback should be discussed with your manager or Facility Corporate Responsibility Officer who may refer the issue to the Centura Corporate Responsibility Department or Legal Department.

### *Documentation Standards*

The accuracy and completeness of Centura’s records are essential to maintaining ethical and professional business practices. You are responsible for accurately, appropriately and timely documenting and charting all care you provide to any Centura patient, resident or other individual in your care. You are also responsible for ensuring medical records meet the requirements of all medical staff bylaws, accreditation standards and relevant laws and regulations.

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

We follow the Emergency Medical Treatment and Active Labor Act (EMTALA), sometimes called the Anti-dumping Statute. **EMTALA** requires an emergency medical screening examination and necessary stabilization for any patient entering an emergency department or other department in a potentially emergent situation. Centura may not delay medical screening or stabilization to



obtain financial or demographic information from the patient. Centura's health care facilities may transfer a patient to another facility at the patient's or treating physician's request or if the health care facility does not have the ability to treat the emergency and appropriate care is available at another facility.

**Q • If we register an emergency room patient before we perform a medical screening examination and stabilization procedures, are we in violation of EMTALA?**

**A •** You may register the patient first only if the process does not delay the medical screening examination and stabilization OR include questions about the patient's ability to pay. It is okay to ask the patient if he/she has insurance and the name of the carrier. Any further questions about financial information must wait until after the medical screening examination. Employees trained in EMTALA regulations and hospital procedures should register the patient.

### *Fraud, Abuse or False Claims/Billing and Coding Accuracy*

Federal and state laws and regulations govern third party billing for our insured patients, residents, and other individuals in our care. You and Centura can be prosecuted for filing inaccurate or fraudulent claims or statements, a practice that carries extremely large civil fines and/or criminal penalties. Centura does not condone and will not tolerate submission of **false, fraudulent, inaccurate, incomplete or fictitious claims** for payment or reimbursement. If you are responsible for medical records, **billing** and/or **coding** and/or are an individual responsible for creating a charge as applicable you shall:

- Ensure that your work is accurate, timely and in compliance with Centura policies, and federal and state laws and regulations.
- Bill only for services actually rendered and **adequately documented** in the medical record, using only billing codes that accurately describe the services provided.
- Immediately notify your supervisor and/or your Facility Corporate Responsibility Officer, the Centura Corporate Responsibility Department or Legal Department if inaccuracies are discovered so that appropriate corrective action can be taken.
- Ensure billing and medical record data is retained for periods prescribed by law and by Centura's **Record Retention Policy** that may require a longer period of retention.

**Q • There is not always documentation for services we bill. My manager has told me to bill for the services even when I do not have documentation to support them. I know that it can take a long time for all the documentation to come into the**



**medical record and I understand that we need to get the bills out as fast as possible in order to receive timely payment, but I am not comfortable doing this. What should I do?**

- A**
- If you are certain that your manager does not have proof that the services were performed, you should report your concern by contacting your Facility Corporate Responsibility Officer or by utilizing the Integrity Helpline. Centura prohibits the submission of inadequately supported bills to any payer.

- Q**
- **Medicare has notified our facility of inappropriate billing practices. I think the specific issue was resolved, but we have not changed our billing practices. My manager does not appear concerned but those of us in staff positions are not comfortable with the way we continue to bill. What are our responsibilities in this situation?**

- A**
- As stated previously, first you should talk with your manager to be certain that you have an accurate understanding of the situation you described. After talking with your manager, if you are not convinced that the inappropriate billing practices have stopped, you should contact your Facility Corporate Responsibility Officer or the Integrity Helpline to ensure the issue is addressed in a timely manner. Remember, the reporting process provides you with several other reporting options when you do not feel an issue has been adequately addressed by your manager.

- Q**
- **I work in the medical records department, and I have noticed that we seem to use the same codes over and over again for billing. I do not think we always code the medical records correctly. Sometimes we use codes that do not accurately reflect the diagnosis or procedures performed. We are pressed to get the bills out on time. What should I do?**

- A**
- Your primary responsibility is to code the bills accurately. You should talk with your manager to explore ways to ensure accuracy and maintain efficiency. Always inform your manager of any claims that are incorrectly coded so that they may be immediately corrected. The codes often determine the amount of payment Centura will receive. If the codes are incorrect, Centura may be due additional reimbursement or may owe money to the patient or third party payer. If you do not feel comfortable discussing the issue with your manager, contact your Facility Corporate Responsibility Officer or the Integrity Helpline to ensure the matter is timely and adequately resolved.



**Q** • Occasionally, a physician will bring a specimen to the laboratory and ask us to run tests on it. The specimens are usually for family members or friends of the physician and are not registered in our system. I have been told by my manager not to bill for these services. Should we bill the physician or patient for these tests?

**A** • Yes, all services performed must be billed, including laboratory tests. Providing the physician with such courtesies may place the organization and the physician at risk for tax and legal consequences. The Centura **Frequently Asked Questions about Giving Gifts to Business Sources** will provide additional guidance on professional business courtesies. You should discuss this matter with your manager or Facility Corporate Responsibility Officer or use the Integrity Helpline if uncertain.

**Q** • Sometimes the physician orders are not included in the medical record. I have also found instances when physician orders included in medical records have not been signed by the physician. What should I do?

**A** • You should inform your manager and/or Facility Corporate Responsibility Officer. Follow your departmental policies for obtaining the physician's signature and ascertaining the appropriate documentation prior to submitting the claim. Claims should not be submitted without the physician's orders being present and signed.

### *Physician Contracting*

All **contractual arrangements with physicians must be in writing** and in accordance with the Centura Physician Relations Manual. A manual is on file with your facility's Physician Contract Coordinator (see Resource Guide at end of booklet) or medical staff office and Centura's Legal Department if you need it for internal reference or business purposes. Any exceptions to the manual must be approved by Centura's Legal Department to ensure the exceptions do not violate applicable law.

**Q** • It is time to renew the medical director's contract. I am the department secretary and my manager has asked me to update the previous contract. Is this appropriate?

**A** • This is not appropriate. The laws and regulations governing contractual relations with physicians are complex and have the potential for severe fines and penalties. Centura has written policies for physician contracting and any deviations or modifications from the written policies should be referred to the facility's Physician Contract Coordinator and/or Legal Department.



### *Tax Exempt Status*

Centura is a non-profit corporation exempt from taxation under the Internal Revenue Code and other applicable state laws. As such, Centura must comply with Internal Revenue Service laws and regulations, engage in activities that further its tax-exempt purpose and use its resources to promote such purpose as opposed to serving the personal interests of any individual.

You are responsible for ensuring that Centura's assets are used exclusively to further our mission and tax-exempt purpose. Compensation and other business arrangements must be entered into on an impartial and fair basis. Also, since Centura is a tax-exempt organization, it must deal with "insiders" of the organization in a manner that does not violate or give the appearance of violating these tax-exempt rules and regulations. An "insider" is defined as any individual who is in a position to influence control over the affairs of the organization. Accordingly, any payments provided to "insiders" by Centura, whether made directly or indirectly, must be at arms length and at fair market value with the services rendered.

Wages and payments must be reported to appropriate taxing authorities, and all tax and information returns must be filed according to applicable laws.

### *Medicare, Medicaid And Other Governmental Payers Compliance*

You must comply with applicable laws affecting Centura and its affiliates' participation in the Medicare, Medicaid and other governmental payer programs. Examples of conduct prohibited by these laws include false billing practices, illegal patient referrals, fee splitting and violations of provider agreements under the Medicare/Medicaid programs. You are expected to seek advice from the Centura Corporate Responsibility Department or Legal department when confronted with business decisions involving a potential or suspected violation of these laws.

- Q** ● **I have heard that some health care organizations engage in aggressive collection tactics through abusive harassing and humiliating collection lawsuits, liens and garnishments. Does Centura?**
- A** ● Centura does not use illegal collection tactics and does not file liens on property.
- Q** ● **Does Centura have a Charity program available to those without insurance and no ability to pay?**
- A** ● Yes, Centura has a charity program that offers discounts to patients without insurance based on their ability to pay.
- Q** ● **I work in a hospital billing department and have been told that all self-pay and uninsured individuals should get a 50% reduction in their bills. Is this correct?**





**A** ● No, not necessarily. Centura has strict guidelines to follow when assessing the financial need of individuals and to what extent each individual should receive a reduction in his/her bill. Each situation is assessed on a case-by-case basis. See Centura's **Charity Care Policy** and guidelines for the uninsured for more guidance.

**Q** ● **How does a patient without insurance find out about discounts and other options available to them?**

**A** ● Centura has financial counselors available to assist patients.  
● However, it is also the patient's responsibility to fill out the correct forms and provide accurate information to the financial counselors.

### *Employment Laws*

You are responsible for complying with applicable laws that regulate employment. Examples of these include wage and hour requirements, federal and state labor and civil rights laws, and workers' compensation laws. You are encouraged to seek advice from Centura's Human Resources, Centura Corporate Responsibility Department or Legal Department personnel when confronted with business decisions involving a potential or suspected violation of these employment laws.

Centura will not tolerate or sanction discrimination or harassment. Centura expects you to demonstrate proper respect and consideration for everyone and every individual's time regardless of their position.

### *Environmental Laws/Safety, Health and Protection*

You must comply with all applicable environmental-related laws. Examples include laws prohibiting discharge of hazardous materials into the air or water as well as laws protecting individuals from exposure to toxic and other hazardous exposures. Seek advice from the Centura Corporate Responsibility Department or Legal Department when confronted with business decisions involving a potential or suspected violation of these environmental laws.

### *Drug-Free Workplace*

Centura is dedicated to activities and services that promote health and wellness and encourage individuals to achieve independence in caring for their health needs. You must perform your duties and responsibilities unimpaired by the presence of controlled substances or alcohol. The exception is prescribed drugs when used in the manner, combination and quantity intended, subject to fitness-for-duty evaluations.

### *Staff Rights*

Quality patient care is a primary function of Centura. Centura respects the religious, ethical and cultural beliefs of individuals but cannot allow the quality or availability of patient care services to be compromised. In the event that a job



assignment, task or responsibility conflicts with your cultural, ethical or religious beliefs and values, and you request not to participate in that aspect of patient care, an attempt will be made to provide you with reasonable accommodation provided such accommodation does not negatively impact patient care.

## **INTEGRITY STANDARD 4: AVOID CONFLICTS OF INTEREST**

Centura is committed to exercising responsible stewardship of natural, human and financial resources as well as its reputation and avoiding conflicts of interest and/or the appearance of conflicts. We expect you to use your position to exercise the best care, skill and judgment for the benefit of Centura and not for personal benefit or to assist others in profiting at the expense of Centura. You should avoid situations that could create an actual or apparent conflict of interest. Actions or relationships that have the potential to create a conflict of interest must be disclosed in advance and approved by the Centura Corporate Responsibility Department or Legal Department.

### *Gifts From And/Or To Business Sources*

You may not accept, directly or indirectly, anything of more than a **nominal value** from any physician, supplier, potential supplier or competitor (collectively referred to as “Business Sources”) of Centura, or from any patient, resident or other individual in Centura’s care. As a general rule, you must adhere to the nominal value limit and any exceptions **must be approved by your Facility Corporate Responsibility Officer**. You must not accept anything of value in connection with your position with Centura that would impair your business judgment. This includes gifts, transportation, education, lodging or entertainment provided or received in connection with your job. Any courtesies or gifts received must be lawful, unsolicited and infrequently provided. In addition, gifts in the form of money or gift certificates may not be accepted at any time. If a physician, patient, resident, family member or other individual **offers a gift** of more than a nominal value, the individual should be referred to the appropriate Foundation. See Centura’s Policy **Gifts From Business Sources** and the **Guidelines Regarding Benefits Provided To Board Members, Physicians, Associates and Others**.

**Q** • **What are some examples of “nominal” gifts that my department or I could accept from a vendor or supplier? What are some examples of what should not be accepted?**

**A** • Examples of “nominal” gifts would include a promotional pen, notebook, or other insignificant item, or a fruit basket, box of candy or other nominal perishable gift.

Examples of gifts that should not be accepted include a catered meal not associated with a business meeting or product demonstration, free product or training not included as part of the original negotiated



contractual arrangement, or other gift offered primarily to maintain an existing or secure a potential business relationship with Centura.

**Q • May I accept an invitation from a vendor to attend a football game, concert or other event?**

**A •** The general policy allows for nominal gifts. Event tickets can be costly especially when you are offered several tickets or on a frequent basis. You should use caution when offered such gratuities. You should seek the approval of your supervisor or Facility Corporate Responsibility Officer prior to accepting the invitation.

**Q • Sometimes a vendor, supplier or other business associate will ask to meet for lunch or dinner. May I accept the offer, and if so are there any general guidelines for business meals?**

**A •** It is usually appropriate to have a meal with a vendor or supplier to discuss business. Either you or the vendor or supplier may pay for the meal. Consult the Centura **Expense Reimbursement Policy** and your supervisor to determine what is appropriate for your department. The meals should not be excessive. In addition, if you are paying for the meal, you are responsible for documenting the business purpose, the location, the cost and the names of people present directly on the expense reimbursement request.

### *Contractor Relations*

All business **relations with contractors must be conducted on an impartial and fair basis**, both in fact and appearance as well as in compliance with Centura policies and procedures. Every effort should be made to **guard against any personal ties with or bias towards contractor** personnel that could be construed by an impartial observer as influencing the decisions you make on behalf of Centura. You have a responsibility to 1) obtain clarification on questionable issues that may arise and 2) report efforts by contractors or others to inappropriately influence business relations and activities.

**Q • My sister-in-law is a health care consultant. Would it be considered a conflict if I recommend her to work on a project at my facility?**

**A •** Not unless you do something to provide your sister-in-law an advantage or special consideration. Your family member may apply or submit a bid to work as a consultant; however, you should not use your position to influence a decision to hire your relative. Also, you may not provide information to your relative that other applicants would not have available to them.



**Q ● My department is considering an equipment contract and the vendor has invited my manager and me to a demonstration off site. May we attend?**

**A ●** Yes, with proper authorization as defined in the Centura Expense Reimbursement Policy. However, you should not allow the vendor to pay the expenses associated with the trip unless the site demonstration was included in the request for proposals (RFP). This would ensure that all bidders are required to pay for a site visit and promote fairness in the bidding process. Travel for site demonstrations must be reasonable and not influenced by the location of the site demonstration. Any vendor-sponsored site visits must be reviewed by the Centura Corporate Responsibility Department.

**Q ● Each year a vendor or supplier will invite me to an annual users conference. The participants are mostly clients of the vendor/supplier's company and are provided with a notebook and pens. Sometimes a meal is served. Occasionally the vendor will invite me to dinner or entertainment after the training session. May I attend the conference and accept the incidentals?**

**A ●** You may attend the conference with prior approval from your supervisor; however, travel and hotel expenses must be paid by Centura unless these expenses are included in the contract. You may also accept the notebook, pens and lunch that are included with the training session. However, if you accompany the vendor to dinner or entertainment, you must pay your portion unless the purpose of the meal or entertainment is supported by a business purpose. You may seek reimbursement for any business-related portion of the expenses you incur in accordance with the guidelines defined in the Centura **Expense Reimbursement Policy.**

**Q ● I am considering buying a piece of computer equipment for my department. The vendor I am negotiating with has offered me a computer and software free of charge for my personal use if I sign a contract for the equipment. The purchase price of the equipment is reasonable and I really need the computer. Is this practice allowed?**

**A ●** No, as defined by the **Conflict of Interest Standards**, Centura does not allow you to accept gifts in exchange for signing contracts or doing business with a company/vendor. This could be viewed as a bribe or inducement. Furthermore, you should review Centura's policies to ensure you are authorized to negotiate contracts and/or commit



funds on behalf of Centura. In addition, departments such as Materials Management or IT may have pre-approved vendor lists for purchases of this nature. It is your responsibility to make sure your purchases comply with these requirements as well.

### *Outside Employment and Business Activity/Consulting*

You and your family members may not use any proprietary or confidential information obtained through your job for any business activity or purpose that results in personal or financial gain to you or your family members. Examples of prohibited activities include using company resources or company time to develop software for sale or donation and competing against Centura in the marketplace.

You are expected to **dedicate your attention and efforts to Centura interests while on duty**. Any activity or situation that might detract from or conflict with Centura interests is prohibited. **Consulting or other outside business activities** require advance approval of your supervisor. Any consulting opportunities or other outside business activities must be conducted on your own time and must not conflict with or affect the performance of your Centura responsibilities. If you hold employment elsewhere, you must disclose the name of your outside employer and the nature of such employment to your department head to determine if a conflict exists.

You are prohibited from providing testimonial statements on behalf of a vendor or contractor for purposes of marketing a vendor or contractor's services in an advertisement, brochure or other marketing material. In some situations you are prohibited from allowing a vendor to advertise software icons. Check with your Facility Corporate Responsibility Officer or the Centura Corporate Responsibility Department if you need clarification.

You may not speak for or make any representation on behalf of Centura unless you have been specifically authorized to do so.

**Q** • **I do consulting for a non-competing company. When I am not too busy, I type my consulting reports at work because I do not have a computer at home. Is this allowed?**

**A** • No, this is not allowed. You are expected to devote your attention to Centura business during work hours, and personal use of Centura property is prohibited. You should contact your supervisor to determine if your job responsibilities could be expanded to provide you with more productive time at work.

**Q** • **I am usually working during business hours and sometimes need to conduct personal business on company time. Is this allowed?**

**A** • Infrequent telephone calls for personal reasons are permitted; however, such calls should be limited in duration and not interfere



with your job responsibilities. You should not use company telephones, faxes, pagers or other electronic communications devices for outside employment or business. In addition, any personal long distance calls should not be charged to Centura.

**Q • I make and sell furniture as a hobby and to earn extra money. Can I advertise my business on the bulletin board in my department or in my facility's cafeteria?**

**A •** No, you are not allowed to advertise your personal business at work. You are expected to devote your attention to your duties while at work. In addition, Centura has a non-solicitation policy prohibiting this activity.

### *Participation on Outside Boards of Directors/Trustees*

You are encouraged to participate in activities within your communities. This may include **servicing on the boards** of directors/trustees of other organizations. When serving as a board member for any organization that may have a conflicting interest with Centura, you must obtain approval from your manager prior to agreeing to serve. Centura retains the right to prohibit membership on any board of directors it believes conflicts with its best interests.

**Q • I am a board member of a local company that does business with a Centura affiliate. Will I need to resign from the Board?**

**A •** Possibly. If the company is for-profit there is increased concern. Such a role may provide compensation and require a time commitment. Are you able to meet your current employment commitments in terms of time and energy if you continue to serve on the board? Also, your involvement on the board may result in a conflict of interest situation. You should discuss this situation with your manager who may refer you to the Centura Corporate Responsibility Department or the Legal Department.

### *Political Activities and Governmental Interaction*

You may not engage in activities that may jeopardize the tax-exempt status of Centura, including certain lobbying and political activities. When acting in your capacity as an associate or representative of Centura, you may not make any agreement on behalf of Centura to **contribute any money, property or services** to any political candidate, party, organization, committee or individual in violation of applicable law. You may personally participate in and contribute to such individuals, organizations or campaigns, but you must do so clearly as individuals using your own funds, on your own time and in your own name.

Centura has many contacts and dealings with governmental bodies and officials. All such contacts and transactions shall be conducted appropriately and in compliance with applicable law. Similarly, any request or demand by a gov-





ernmental representative to receive a questionable personal benefit is to be refused and immediately reported to the Centura Corporate Responsibility Department.

**Q:** My brother-in-law is seeking election to the House of Representatives and his campaign is based on decreased government regulations for health care. I have made a personal contribution to his campaign but would like to use my facility's copier to make some campaign flyers. Is this allowed?

**A:** No, this is not allowed. Centura, as a tax-exempt organization, may not contribute money or resources to political campaigns. Also, you may not use Centura equipment or resources for personal benefit.

### **INTEGRITY STANDARD 5: PROTECT CONFIDENTIAL INFORMATION**

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You may see a wide range of information that is confidential, sensitive or proprietary. That includes information that we create and own or that is owned by others and provided to us for limited use. This information may come in many forms, including paper or electronic records, voice mail or personal knowledge. We expect you to maintain a high level of confidentiality relative to this information.

#### *Patient Information*

We expect you to keep patient information confidential and obey Patient Privacy laws and rules that apply. You should prevent the release of any personal or **confidential information** about a patient unless it is needed for lawful business or patient care. Also, you should not seek personal or private information about any patient if you do not need it to complete your work duties. Access to patient information must be kept within the scope of your duties and responsibility.

**Q:** Some of my friends work for other health care organizations in our area. We talk about a lot of things but often the subject of work arises. Is this appropriate?

**A:** Patient information is always confidential and should only be disclosed as per the guidelines outlined in the Centura **Integrity Standards**, Centura policy related to **Minimum Necessary Standard for Disclosure or Request of Protected Health Information (PHI)** and your facility policies.

Also, information obtained as a result of employment with Centura is considered confidential. It is wise to avoid discussions concerning



specific work issues. Talk with your manager if you have any questions about what is appropriate to discuss outside the workplace.

**Q** ● I was in the break room and heard my manager discussing the medical condition of a physician's spouse who is receiving treatments at our facility. I felt uncomfortable overhearing the discussion. How would I handle such a situation in the future?

**A** ● Physicians and their families, like others, are entitled to have their health status remain confidential. The situation you described is against Centura policy and violates the **Integrity Standards**. You are encouraged to discuss the issue with your manager. If you do not feel comfortable doing this, contact your Facility Corporate Responsibility Officer or the Integrity Helpline.

### *Misappropriation of Proprietary Information*

Centura is committed to maintaining and protecting the confidentiality of organizational information, which includes business, clinical and your information. You are prohibited from **misappropriating confidential or proprietary information belonging to another** person or entity. **Copyrighted, trademarked, or licensed materials** may not be reproduced or used without written permission from the holder of the proprietary right. You are prohibited from using or copying any customer, supplier, associate or price lists, contract, document, publication, computer system or software information or product in violation of a third party's interest in such product.

You shall safeguard proprietary information obtained through your employment or business relationship with Centura. Confidential business information obtained from competitors in violation of a covenant not to compete, a prior employment agreement, or another contract shall not to be used when conducting business on behalf of Centura.

**Q** ● I recently went to an educational conference and received a notebook of material that will benefit my department. May I make copies of the information to distribute to my co-workers?

**A** ● If the materials are copyrighted, you may not copy them without the written permission of the license holder. You may summarize the information to give to your co-workers or provide your co-workers access to the original materials.

**Q** ● Some associates in our facility have copied software on their computers at work that was not purchased by the organization. Is this permitted?



**A**

- Centura forbids the use of unlicensed software on any of their computers.
- Copying licensed software without written permission is illegal and may result in financial penalties for the organization. If you identify unlicensed software on a Centura-owned computer, it must be removed as soon as possible. If you refuse to remove unlicensed software, anyone with knowledge can and should report the situation to his/her manager or Facility Corporate Responsibility Officer or the Integrity Helpline.

**Q**

- **Prior to coming to work at Centura, I consulted with a competing health care system. My agreement had a non-disclosure clause, but no one ever enforces those. I learned things about that organization that will help Centura when negotiating certain contracts. With whom should I share this information?**

**A**

- No one. You should not disclose confidential or proprietary information obtained through a prior contractual or employment relationship. Centura prohibits the use of such information in their business dealings.

### *Patient Rights*

Patients, residents and other individuals in our care have a fundamental right to considerate care in a manner that safeguards their personal dignity and respects their cultural and spiritual values. Understanding and respecting these values guide Centura in meeting the care needs and preferences of our patients, residents and other individuals in our care. Centura's goal is to provide an exceptional patient experience by focusing on patient satisfaction, improving patient outcomes and maintaining high standards of medical ethics in the delivery of patient care by **respecting the rights of each patient**, resident or other individual in our care in an ethical and professional manner. Centura is committed to upholding the following patient's rights:

- To provide access to the ethics committee (located in each health care facility). The ethics committee's purpose is three-fold:
  - To provide education to health care personnel about the nature of medical ethics;
  - To ensure organizational policies and procedures are adequate in ensuring and protecting the rights of patients, residents and other individuals in our care; and
  - To provide consultation and case review on ethical issues that arise in the delivery of patient care.
- To receive accurate and timely information regarding patient's health, diagnosis, prognosis and information necessary to make informed decisions and choices regarding treatment.



- To review information contained in the patient’s medical record. Patients may review this information at reasonable times and upon reasonable notice in accordance with applicable law. When reviewing medical record information, individuals may ask to be accompanied by a health care provider to assist them in understanding its contents.

Please refer to the Notice of Privacy Practices (Notice) and Patient’s Rights and Responsibilities guidelines, if applicable, at your individual facility for a full description of Centura patients’ fundamental rights. In compliance with the Health Insurance Portability and Accountability Act of 1996 (HIPAA), the Notice is made available to all patients, residents and Business Sources, and Centura expects you to comply with its requirements.

**Q • If I observe a patient not being treated with proper courtesy and respect, what should I do?**

**A •** You are encouraged to talk with your manager. If you do not get a satisfactory response from your manager, contact your facility patient representative, Facility Corporate Responsibility Officer or use the Integrity Helpline. Centura believes in respect for all people. We should never be discourteous or disrespectful to anyone.

## **INTEGRITY STANDARD 6: PROVIDE QUALITY CARE**

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We are committed to maintaining an environment where we treat everyone with dignity and respect and our hallmark is high quality, holistic health care.

### *Quality of Care*

We are committed to the consistent delivery of patient care without regard to race, color, religion, gender, sexual preference, national origin, age, disability, payer source or ability to pay. It is our goal to provide service to our patients, residents, and other individuals in our care with skill, concern and compassion. We expect you to be accountable for the **quality of care** or service we provide and for modeling the service and behavioral standards as set forth in these **Integrity Standards**.

**Q • To whom should I report quality of care issues?**

**A •** Quality of care issues encompass numerous aspects of care so there is no specific process for reporting. Any issue concerning quality of care should first be discussed with your manager. Some issues can be handled directly by them. More serious issues might need to be evaluated by the health care facility’s quality or risk management departments. These more serious issues may be brought forward by you or



the manager. If for any reason you do not feel your quality of care issue is being adequately addressed, use the Integrity Helpline.

## **COMPLIANCE WITH THE INTEGRITY STANDARDS AND REPORTING CONCERNS**

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In keeping with Centura's mission and core values, any person who is involved in or becomes aware of any events, which are, or appear to be, in violation of the standards, shall utilize the Process for reporting concerns as outlined below:

- Contact your supervisor or a manager within your facility or department to discuss the matter.
- If you do not feel comfortable discussing the matter with your supervisor or in accordance with your normal chain of command or you do not feel the matter was adequately resolved, contact your facility compliance officer Facility Corporate Responsibility Officer.
- If you do not feel comfortable with speaking to an individual in your facility or department or you do not feel your matter has been adequately addressed by anyone you have spoken to, contact the Centura Corporate Responsibility Department and/or Legal Department. See the list of Resources at the end of the booklet.
- If you do not feel comfortable discussing the matter using one of the three alternatives above, call the Centura Integrity Helpline at 1-888-424-2458 or access the Helpline via MyVirtual Workplace portal at [www.integrityhelpline.org](http://www.integrityhelpline.org).

Because some reports may be made as a result of misunderstandings of the facts and circumstances, it is the desire of Centura to have timely knowledge of and investigate any suspected violation in order to avoid further misunderstandings, bad feelings and disrupted relationships when there is in fact no violation of the Standards.

All disclosures, interviews, reports, statements, memoranda or other data concerning a suspected violation shall be confidential except where disclosure is required by law. It is the policy of Centura that an individual, who, in good faith, discloses activities of another that are or appear to be violations of the **Integrity Standards**, shall not be subject to retaliation by Centura Health, its associates and other relevant business sources. This does not imply, however, that disciplinary action will not be taken or considered if the individual reporting has personal involvement in the reported activity.

Alleged violations will be triaged and/or investigated by the Centura Corporate Responsibility Department. If a violation has occurred, the individual committing



the violation will be subject to discipline according to established disciplinary policy, which may lead to suspension, termination or other disciplinary action.

The **Integrity Standards** will be distributed to Centura board and committee members, officers, associates, volunteers, medical staff members and others as deemed appropriate.

In addition, Centura's Board of Trustees and its committee members and officers, associates, and volunteers must submit a statement affirming in writing, receipt of and training on the **Integrity Standards** and agreement to abide by the Standards as outlined in the booklet. Failure to return the Acknowledgment of the Centura Integrity Standards Statement (Integrity Statement) will be investigated by the Centura Corporate Responsibility Department. If you fail to return the Integrity Statement, you may be subject to discipline, which may lead to suspension or termination.

## **ARE MY ACTIONS CONSISTENT WITH CENTURA'S MISSION AND VALUES?**

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### *A Process to Determine Whether Actions are Ethical*

We recognize there are many regulations, statutes, laws, and organizational policy that govern health care and the health care facility or service line for which you work. Ethics and proper business conduct can sometimes be confusing. When you feel confused about an issue and are unsure of potential ethical implications, we recommend you ask yourself the following questions to lend clarity to the situation.

- Are my decisions based on sound judgment and common sense?
- Are my actions legal?
- Have I exercised good faith and honesty in all dealings and transactions?
- What would I tell my coworker to do?
- Is my decision in the best interest of my organization and Centura?
- Will any part of my decision cause me anxiety?
- At some future date, will I look back and say, "I should have done it differently"?

In addition, we strongly encourage you to use the Values Impact Analysis (VIA) process developed and supported by Centura and based on making decisions with integrity that are comprehensive and respectful of all stakeholders. As a reminder that process is:





### *When to Use a VIA*

- **Importance**  
Would the decision influence the handling of important future issues?
- **Impact**  
Would the decision affect the significant stakeholders/services?
- **Resources**  
Does the decision involve the allocation of a significant amount of Centura resources?
- **Profile**  
Will the decision have high visibility, internally and externally?

If any of these apply to this decision, VIA is needed. Before starting the VIA process, ask these questions:

1. Do we have all the available information about the decision?
2. Who should participate in this process?
3. Who will make this decision?
4. How will the decision be made?
5. What is the role of this group? Decision maker, recommend, advisory?
6. How much time will this process require?
7. Who will lead this process?

### *Values Impact Analysis (VIA): Steps*

#### **Step 1:** *What point of view do I bring to this decision?*

**Outcome:** Awareness and clarity about differing perspectives

- Make sure everyone gets involved and responds briefly to the basic question.
- If there is time, follow up with another round and ask “What assumptions, if any, are you making about this decision?”
- THEN, keep these different perspectives in mind when people discuss what matters to them so the dialogue can deepen.

#### **Step 2:** *What is important to the organization, me, and to those affected by this decision?*

**Outcome:** List of values to consider.

- Take time to hear briefly from everyone and build a comprehensive list of what is important to all stakeholders. Define the values discussed – “Stewardship,” “Integrity,” and “Quality” by saying what they mean in this situation.



- Take time to reflect on what was said to insure understanding, to confirm key points and to insure clarity.

### **Step 3:** *What are the most important values that should guide our decision?*

**Outcome:** Prioritize key values:

- Ask each person to advocate for the most important values that should guide the decision.
- Make sure that everyone clarifies the reason(s) for their choice of top values. These reasons are important to understand so everyone has a chance to influence others and be heard.

### **Step 4:** *Which option is the best fit with the guiding values:*

**Outcome:** Alignment between values and action.

- Consider all the available options and determine which one aligns with the most important values.
- Make sure you consider the down side BEFORE finalizing the decision.
- Who will be most affected by this decision?
- Which important values do not receive priority?

### **Step 5:** *How can/will we communicate this decision?*

**Outcome:** Decision that gains support.

- Use the VIA decision worksheet to cover the key communication elements (see attachment). Articulate the downside and acknowledge what issues you struggled with when making the decision.

If you are still unsure of the ethical implications in a situation, use the resources available to you. Talk with your immediate supervisor or contact your organization's designated Facility Corporate Responsibility Officer or your CEO (please see your specific contact details on the back cover of this booklet).

You also have available to you the **Integrity Helpline**. Centura maintains a toll-free helpline for you to report your concerns. The **Integrity Helpline** number is 1-888-424-2458. The helpline staff is available to take calls 24 hours a day, seven days a week. You are encouraged to call the helpline for clarification or to report any suspected violation of federal, state or local laws, regulations, Centura policy, or the Integrity Standards that you feel cannot be addressed through the normal reporting structure.

Calls to the helpline are received by trained, designated helpline staff that will document and forward your information to the Centura Corporate Responsibility Department for determination of appropriate action. Calls to the helpline will not be traced or recorded. If you call the helpline, you have the option to remain anonymous. If you choose to identify yourself, there is no guarantee that your



identity will remain confidential. It may, however, make it easier for the Centura Corporate Responsibility Department to provide you with a direct response to your concern.

Electronic filing of your complaint is also available. You can access this electronic complaint form via the following link: [www.integrityhelpline.org](http://www.integrityhelpline.org). The same process given in the telephonic filing of reports of concern will apply to electronic filings as well.

Centura prohibits anyone from taking any action of retaliation against any individual for discussing any conduct with his/her supervisor, Centura management, Centura Corporate Responsibility Department or Legal Department personnel, or by utilizing the Centura Integrity Helpline either telephonically or electronically to make a good faith report, complaint or inquiry. However, the anti-retaliation policy will not protect you from the consequences of your own conduct. If you report conduct in which you are involved, Centura may impose the appropriate discipline in accordance with organizational disciplinary policy.

## REFERENCE GUIDE

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IF YOU HAVE any questions regarding the concepts identified within the **Integrity Standards** or wish to review your organization's policies, please contact your organization's Facility Corporate Responsibility Officer or the Centura Corporate Responsibility Department.

To further guide you in directing your concerns to appropriate personnel, we are providing a list, which identifies the types of concerns to be handled by the departments/personnel as indicated below. If you have a concern you want to communicate which is not listed here and you are unsure who or what department should handle it, contact your Facility Corporate Responsibility Officer or utilize one of the contacts listed under the **Contacts/Resources** portion of this booklet.

### *Issues Handled By Facility Corporate Responsibility Officer*

- Corporate Responsibility Education and Training
- Corporate Responsibility Orientation
- Billing-related issues
- Improper or incorrect documentation supporting billing
- Noncompliance with Integrity Standards, policies and procedures adopted as part of the Centura Corporate Responsibility Program
- Falsification of records
- Fraudulent activities



- Conflicts of interest issues
- Contract-related issues
- Disclosures of confidential information
- Accountings for disclosures of confidential information
- Other patient privacy issues
- Other information security issues
- Misuse of assets
- Compensation arrangements related to a contract
- Contractual relationships potentially involving referrals of patients/residents
- Medically unnecessary services provided to patient/residents
- Other activities violating any federal, state or local law, statute, regulations, guidelines or rules which govern the health care industry

#### *Issues Handled by Safety Personnel/Department*

- OSHA issues

#### *Issues Handled by Human Resource Personnel/Department*

- Employee Retirement Income Security Act of 1974 (ERISA) issues
- Sexual harassment issues
- Equal Employment Opportunity (EEO) and discrimination issues
- Americans with Disabilities Act issues
- Illegal drug use issues
- Labor relations/union issues
- Workplace safety issues
- Worker's compensation issues
- Weapons and violence in the workplace or on workplace premises
- Gambling in workplace or on workplace premises
- Unexcused absences or repeated tardiness
- Compensation arrangements unless related to a contract
- Employee benefits

#### *Issues Handled by Ethics Personnel/Ethics Department/Social Worker/Director of Nursing/Pastoral Care*

- Patient mishandling
- End of Life issues



## Acknowledgment of Centura Integrity Standards

I acknowledge that I have received my personal copy of the **Integrity Standards** booklet and have received training on the Centura Corporate Responsibility Program. I understand it is my responsibility to become familiar with the Integrity Standards listed in this booklet.

I understand I can contact my Facility Corporate Responsibility Officer with questions or concerns regarding these Integrity Standards or Centura's VP, Corporate Responsibility Officer. I understand that it is my responsibility to report any concerns regarding possible violations of the Centura Corporate Responsibility Program and the Integrity Standards. Furthermore, I understand that I am protected against retaliation for reporting in good faith such concerns.

I agree to abide by the **Integrity Standards** outlined in this handbook. I understand that adherence to these Standards is a condition of employment or affiliation with Centura Health. I also understand that these standards may be amended, modified or clarified at any time and that I will receive any updates that occur as a result of these changes.

Signature \_\_\_\_\_

Print Name \_\_\_\_\_

Date \_\_\_\_\_

Title \_\_\_\_\_

Facility/Location and Department Name \_\_\_\_\_

Send or forward this Acknowledgment to the Human Resources Department  
for retention in your employment file.





## **RESOURCE GUIDE**

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**Centura Corporate Responsibility Department** (303) 804-8139

**Centura Legal Department** (303) 804-8104

### **Centura Human Resources**

Local Human Resources Representative  
See Facility Directory

### **Integrity Helpline**

Telephone Access

**888-424-2458**

Web site Access

**[www.integrityhelpline.org](http://www.integrityhelpline.org)**

A place to report any situation that threatens our values, assets and/or our reputation.

### **Corporate Responsibility Web site**

**[www.myvirtualworkplace.org](http://www.myvirtualworkplace.org)**

Under Departments, see Corporate Responsibility

A resource for all corporate responsibility information, education tools, policies and procedures.







**Centura Health**<sup>®</sup>

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