



EAST TENNESSEE

Children's Hospital

Code of Conduct and Ethics



January 2018

WHY WE HAVE A CODE OF CONDUCT AND ETHICS

The ETCH commitment to integrity is a vital part of who we are as a leading pediatric health care provider.

The ETCH Code of Conduct and Ethics provides us with a set of standards that guides our decision-making and our commitment to “doing the right thing.” This means conducting all aspects of our business within appropriate ethical, legal and regulatory standards, and complying with ETCH’s policies and standards. As we do this in our daily work, doing the right thing means we:

- Dedicate ourselves to ETCH’s Vision and Mission.
- Uphold ethical principles in the workplace.
- Work to ensure ETCH is in full compliance with all applicable laws, regulations, policies and standards governing our day to day business activities.
- Report concerns about improper, inappropriate or illegal actions promptly, in good faith and without fear of retaliation.

In addition to the Code of Conduct and Ethics, there are ETCH departmental policies, procedures and standards that may apply to specific jobs. You can obtain copies of these from your supervisor or on ETCHnet.

The Code of Conduct and Ethics addresses four areas:

1. Our Patients
2. Legal and Regulatory Compliance
3. Workplace Conduct and Employment Practices
4. Marketing and Political Activities

CODE OF CONDUCT AND ETHICS

1. OUR PATIENTS

Our goal is to improve the health of children by providing high quality, cost effective healthcare and services to our patients, their families, guests and the community. To that end, we are committed to ideal patient care, which means that we strive to deliver safe, effective, efficient, compassionate and satisfying patient care to every patient, every time. We treat all patients with respect and dignity and provide care that is both necessary and appropriate. On admission, each patient’s family/guardian is given a Statement of Patient Rights and Responsibilities, including information about the right to make decisions regarding medical care. We practice family-centered care and encourage patient and family involvement in all aspects of care.



2. LEGAL AND REGULATORY COMPLIANCE

Coding and Billing

ETCH will consistently strive to assure systems are in place for submitting bills to government payers and all other payers that are truthful, accurate and conform to the requirements of federal and state laws and regulations. We commit to:

- Always strive to conduct our billing in an open, honest and fair manner and report fraud and abuse directly and timely.
- Follow documented ETCH billing and coding policies and procedures.
- Ensure proper and accurate coding of diagnostic, procedural and billing codes and bill only for services provided and documented in our patients' medical records.
- Provide services that are medically necessary and ordered by a credentialed physician or other appropriately licensed individual.
- Document, correct and report in a timely fashion any significant identified billing errors.
- Process payments in a timely manner and request recoupment or refund of any overpayments in a timely manner.
- Make no inappropriate changes to claim forms.
- Perform random internal and external audits to review for coding and billing errors.
- Research for proper billing and coding guidelines where there are questions of proper claim submission and determine if any current protocol or process changes are necessary.
- Bring to the attention of a supervisor or the Compliance Officer any billing practices that are not truthful, accurate or do not conform to requirements of federal, state or local laws and regulations.
- Ask for help or clarification from management if there is something that is not understood related to billing or coding practice.
- Manage all records in accordance with the ETCH medical records policies.
- Keep claim and records information confidential.
- Prohibit the premature destruction of any records in response to, or in anticipation of, any request for those documents by any government agency or court.
- Realize that any data knowingly falsified on a claim that is submitted to the government constitutes a crime and will leave both ETCH and individuals subject to criminal prosecution and penalties and fines.

Relationships with Referral Sources

ETCH is subject to various federal and state laws and regulations regarding financial arrangements with physicians and other referral sources. Generally, these laws prohibit payments in exchange for the referral of patients or business. We will comply with these laws when entering into any financial arrangement with referral sources. We will only accept patient referrals and admissions based on a patient's clinical needs and our ability to render the needed services. We will not pay or offer anything of value, directly or indirectly, to anyone for referring patients or business to us.



Licensure, Certification and Excluded Individuals

ETCH will, through its credentialing and licensure verification processes, make appropriate efforts to verify the qualification of healthcare professionals who treat our patients. We will only bill for the services of individuals or entities that are eligible to participate in applicable state or federal healthcare programs.

Response to Government Investigations

Various external organizations may contact ETCH, or individuals employed by or associated with ETCH to initiate a compliance-related investigation. We will comply with any lawful and reasonable request or demand made as part of a government investigation and will provide truthful responses to government inquiries. At the same time, we will strive to protect the rights of ETCH and those associated with it. We will contact the Compliance Officer immediately in the event of an inquiry, visit, subpoena or other legal document from a governmental agency regarding ETCH business.

Information Security

We recognize that the provision of healthcare services generates business, financial, and patient-related information that requires special protection. We will maintain systems that ensure such information is used appropriately and safeguarded zealously. We will develop systems, policies and procedures sufficient to protect the integrity of our documents and records and will comply with federal and state laws and regulations, including HIPAA, regarding the confidentiality of patients' medical, financial and other personal information.



3. WORKPLACE CONDUCT AND EMPLOYMENT PRACTICES

We are committed to providing an inclusive work environment where everyone is treated with dignity, fairness and respect. We will make ourselves accountable to one another for the manner in which we treat one another and the manner in which people around us are treated. ETCH employees will familiarize themselves and comply with the contents of the Employee Handbook, as well as the policies and procedures applicable to our employment and responsibilities.

Equal Employment Opportunities

We will provide equal employment opportunities to prospective and current employees based solely on merit, qualifications and abilities, and we will not discriminate in employment opportunities or practices on the basis of race, color, religion, creed, sex, national origin, age, disability, sexual orientation, military status or any other status protected by law.

Conflicts of Interest

A conflict of interest may occur if outside activities, personal financial interests, or other personal interests influence or appear to influence an individual's ability to make objective decisions in the course of his or her responsibilities to ETCH. Business decisions of ETCH employees must always be objective and made in the best interest of ETCH and not motivated by personal interest or gain. ETCH employees will avoid conflicts of interest or the appearance of conflicts, and must comply with ETCH's Conflicts of Interest policies. If there is any doubt about a situation, it must be fully disclosed to a supervisor or to the Compliance Officer so that a determination can be made.

Gifts and Entertainment

Our commitment to integrity in the delivery of quality patient care and other services requires we keep relationships with current or potential business associates of ETCH impartial. Accepting or extending gifts and offers of entertainment creates a risk that judgment and decisions can be influenced. Consequently, cash or cash equivalents, such as gift certificates or gift cards, may never be accepted from or extended to current or potential business associates. Any gift beyond a reasonable business courtesy may not be accepted if the circumstances surrounding the giving and receipt of the gift indicate the intent to influence a business decision. Non-cash gifts of nominal or little value may be accepted. Reasonable business courtesies, such as meals, sporting events, golf tournaments, local entertainment, business meetings and conferences, extended by current or potential business associates may be accepted provided the cost associated with such courtesies is reasonable and appropriate and such events are infrequent.

Health, Safety and Environmental Concerns

We will strive to provide a safe physical environment that is reasonably free of hazards and that is safe and secure for patients, employees, medical staff and visitors. We will comply with all applicable workplace health, safety and environmental laws and regulations, including those governing the handling, storage, use and disposal of hazardous materials and other pollutants and infectious waste.

Harassment, Bullying and Workplace Violence

We recognize the right of each individual to a workplace free of violence and harassment, and we will not tolerate any form of harassment, bullying or violence. We will implement policies and procedures that promote appropriate conduct in the workplace and prohibit unwanted or hostile interaction, including degrading or humiliating jokes, physical or verbal intimidation, slurs, or other harassing conduct. We will not tolerate any form of sexual harassment, either overt, such as request for sexual favors in return for promotions or less obvious forms of harassment, such as sexual comments.

4. MARKETING AND POLITICAL ACTIVITIES

Marketing Activities

ETCH is committed to fair competition and honest dealing with customers, suppliers, competitors and employees. We strive to present only truthful, fully-informative and non deceptive information in all marketing and advertising activities. In all dealings with competitors, we will comply with anti-trust and other laws governing competitive activities.

Lobbying and Political Activities

As a tax exempt organization, ETCH will follow current legal and regulatory requirements for all lobbying and political activities. Although ETCH will not participate in any political campaign on behalf of or in opposition to any candidate for public office, individuals are free to engage in political and legislative activities in their personal capacity on their personal time. No use of corporate resources, including e-mail, is appropriate for personally engaging in political activity.



PERSONAL COMMITMENT AND CERTIFICATION

I acknowledge and certify that I have received the East Tennessee Children's Hospital Code of Conduct and Ethics. I understand my obligations to read and follow the Code. I agree to comply with East Tennessee Children's Hospital's Code of Conduct and Ethics.

Employees: I understand that compliance with this Code is a condition of my continued employment. I further understand that violation of the Code of Conduct and Ethics may result in disciplinary action up to and including termination.

Initials: _____

Board of Directors: I understand that compliance with this Code is essential to my service on the Board of Directors of East Tennessee Children's Hospital.

Initials: _____

Medical Staff and Allied Health Professionals: I understand that compliance with this Code is a condition to my ability to practice my profession at East Tennessee Children's Hospital. I further understand that violation of the Code of Conduct and Ethics may result in disciplinary action as provided in the Bylaws of the Medical and Dental Staff and Allied Health Professionals.

Initials: _____

Agents: I understand that compliance with this Code is a condition of my continued ability to furnish services to East Tennessee Children's Hospital. I further understand that violation of the Code of Conduct and Ethics may result in a termination of any relationship with East Tennessee Children's Hospital.

Initials: _____

Please sign here: _____ Date: _____

Please print your name: _____

Department: _____ Employee ID #: _____