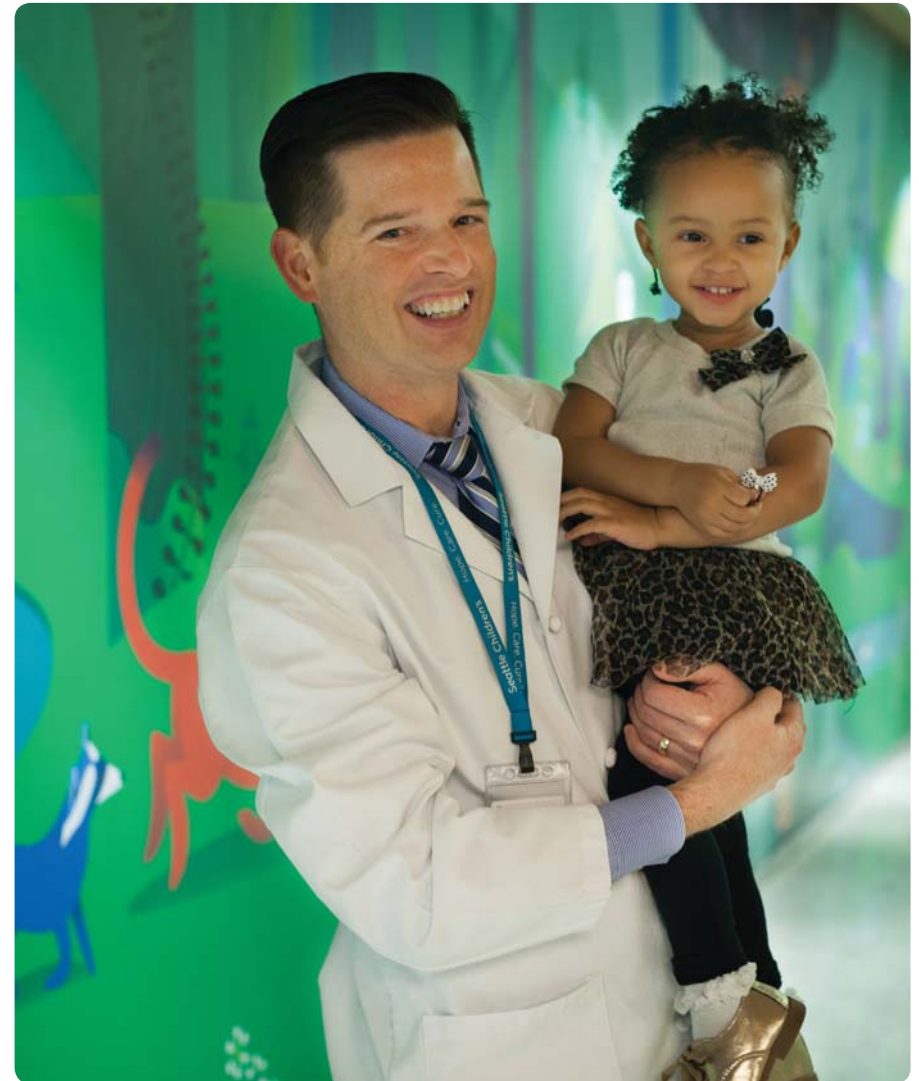


Hope. Care. Cure.™

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Corporate Compliance Program and Code of Conduct

We are all responsible.





The statements contained in the following pages are guidelines only and do not constitute an express or implied contract for employment nor promise of any specific benefit, procedure, or treatment in any particular situation. Seattle Children's is an at-will employer, which means that you may resign at any time, with or without a reason or notice, and Seattle Children's may terminate your employment at any time, with or without cause or notice. Nothing in the following pages and nothing in the work environment at Seattle Children's can modify the at-will status of employment. No one at Seattle Children's except for the Board of Trustees, and then only in writing, is authorized to alter the at-will status of employment.

About Seattle Children's

Hope. Care. Cure.™

These three simple words capture what we are here to do. That's because at Seattle Children's, compassionate care, breakthrough research and generous donors come together everyday for the children who need us.

We are united by a compelling mission: We provide hope, care and cures to help every child live the healthiest and most fulfilling life possible.

Seattle Children's consists of:

Seattle Children's Hospital
Seattle Children's Research Institute
Seattle Children's Hospital Foundation &
Guild Association

Together, we deliver superior patient care, advance new discoveries and treatments through pediatric research and serve as the pediatric and adolescent academic medical referral center for Washington, Alaska, Montana and Idaho - the largest region of any children's hospital in the country.

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Dear Fellow Children's Staff and Faculty:

Enclosed is your copy of Seattle Children's Compliance Code of Conduct. These materials, developed with input from our employees, senior management and the Board of Trustees, strive to: tell you about the basic laws that govern our daily work and the standards of behavior expected at Seattle Children's; communicate our commitment to follow laws, regulations, standards of care and ethical business practices; and help you understand how you can help ensure Seattle Children's remains compliant with all the laws and regulations that govern our organization and support our mission.

These materials serve as a reference point for compliance standards. We outline a process to follow if you should ever have any questions or concerns. Seattle Children's will continue to provide detailed communications and training regarding the laws and regulations that apply to your specific job functions. It is your responsibility to understand, learn and obey these rules. If you ever feel uncertain about the right thing to do, I encourage you to ASK. You will not be penalized for asking a question about your legal or ethical responsibilities.

The importance of following the standards in these materials cannot be overemphasized. A violation of law or unethical conduct in delivering health care services could reduce the quality of patient care and even harm patients. It could also cause Seattle Children's to have to pay fines.

Seattle Children's provides excellent, safe, quality care to children and families throughout the Washington, Alaska, Montana and Idaho (WAMI) region. Since Seattle Children's founding in 1907, our ethical and professional conduct has earned us an unsurpassed reputation. Our priority is delivering the best outcomes possible for our patients and their families. Our culture is based on achieving these results by doing things the right way. Thank you for your continued support of Seattle Children's mission and dedication to excellence.



Sincerely yours,

A handwritten signature in black ink, appearing to read "Jeff Sperring".

Jeff Sperring, MD
Chief Executive Officer

Mission, Vision and Values

Mission Statement:

We provide hope, care and cures to help every child live the healthiest and most fulfilling life possible.

Vision Statement:

Seattle Children's will be an innovative leader in pediatric health and wellness through our unsurpassed quality, clinical care, relentless spirit of inquiry, and compassion for children and their families.

Our founding promise to the community is as valid today as it was over a century ago. We will care for all children in our region, regardless of their family's ability to pay.

We will:

- Practice the safest, most ethical and effective medical care possible.
- Discover new treatments and cures through breakthrough research.
- Promote healthy communities while reducing health disparities.
- Empower our team members to reach their highest potential in a respectful work environment.
- Educate and inspire the next generation of faculty, staff and leaders.
- Build on a culture of philanthropy for patient care and research.



Values Statement

COMPASSION

Empathy for patients, their families and staff is ingrained in our history and inspires our future. We do more than treat the child; we practice family-centered care as the cornerstone of compassion.

EXCELLENCE

Our promise to treat, prevent and cure pediatric disease is an enormous responsibility. We follow the highest standards of quality and safety and expect accountability from each other.

INTEGRITY

At all times, we approach our work with openness, transparency, decency and humility. It is our responsibility to use resources wisely to sustain Seattle Children's for generations to come.

COLLABORATION

We work in partnership with patients, their families, staff, providers, volunteers and donors. This spirit of respectful cooperation extends beyond our walls to our business partners and the community.

EQUITY

We embrace and find strength in the diversity of our patients, their families, staff and community. We believe all children deserve exceptional care, the best outcomes, respect and a safe environment.

INNOVATION

We aspire to be an innovative leader in pediatric healthcare, research and philanthropy. We continually seek new and better solutions. Because innovation springs from knowledge, we foster learning in all disciplines.

Seattle Children's Code of Conduct

The Code of Conduct is applicable to the entire Seattle Children's workforce. The term "work force" includes, but is not limited to, employees, medical staff, volunteers, contractors, vendors and students.

In alignment with our values, Seattle Children's has adopted these standards as our Code of Conduct:

Compassion:

- We act in accordance with Seattle Children's Community Standards of Accountability, Respect and Teamwork (ART).

Excellence:

- We strive to deliver excellent quality care to our patients.

Integrity:

- Integrity, both personal and professional, is and always has been our most important asset.
- When confronted with a choice, we do the right thing.
- We expect ethical conduct in all our activities.

Collaboration:

- Our relationships with our patients, other professionals and vendors are essential to our business. They must be built upon credibility and mutual respect.
- When in doubt about the rules, we ask.
- We are committed to an environment that fosters communication and partnerships among patients, families and staff.

Equity:

- We strive for excellence in family-centered care, quality, responsible research, cultural competency and workplace engagement.

Innovation:

- We care not only for the end result, but also how we achieve that result.
- We strive for an environment that fosters innovative thinking

Corporate Compliance Program

Corporate Compliance is a mandated program designed to promote and reflect Seattle Children's commitment to maintain the highest level of integrity, ethical standards and core values.

The program is comprehensively designed to ensure that we conduct our business with integrity and in accordance with applicable laws, policies as well as to promote a safe environment for raising compliance concerns and questions.

For program effectiveness, we have adopted foundational elements as recommended by the U.S. Sentencing Commission and the U.S. Department of Health and Human Services Office of Inspector General.

Elements of Program Effectiveness

- Designating a compliance officer and oversight compliance committees
- Conducting periodic compliance risk assessments
- Developing and implementing written policies, procedures, and standards of conduct
- Developing and conducting effective training and education
- Developing open lines of communication
- Conducting ongoing auditing and monitoring of risk areas
- Enforcing disciplinary guidelines
- Responding promptly to detected offenses and undertaking corrective action

The Corporate Compliance team is committed to support our workforce by communicating compliance requirements and helping to embed the ethical culture in our everyday operations. Seattle Children's commitment to ethical behavior is reflected in our Compliance Code of Conduct and our business practices.

The Code of Conduct identifies foundational principles that apply to each member of our workforce. Compliance education and training is conducted by the Corporate Compliance department to promote awareness and communicate Seattle Children's policies, procedures and expected conduct.

Questions about specific compliance or ethical issues should be directed to the department or to the Corporate Compliance Officer.

For further information go to Corporate Compliance on CHILD.

Laws and Regulations

As mandated by the Patient Protection and Affordable Care Act, the Corporate Compliance Program has been established to formally support Seattle Children's ongoing effort to prevent, detect and resolve conduct that does not conform to federal and state law, as well as the requirements of participating in federal, state and commercial health care programs. The following sections summarize some of the major statutes and regulations that affect our activities. Our Compliance policies and procedures, which are available on CHILd, provide further information about our strategies for preventing fraud, waste and abuse. Please direct any questions or concerns regarding compliance with these laws to the Compliance Helpline (1-877-483-3049).

False Claims Act – 31 U.S.C. §§ 3729-3733

The federal False Claims Act prohibits the knowing submission of a false or fraudulent claim for payment for an item or service to a government health care program. Similarly, state law prohibits the knowing submission of false or fraudulent claims to Medicaid (see page 7). A person who acts in reckless disregard or in deliberate ignorance of the truth or falsity of the information submitted to the government may also face liability.

A claim may be false if any of the items or services were not provided as claimed. Claims may also be false if the items or services were not reasonable and necessary for the diagnosis or treatment of illness or injury or to improve the functioning of a malformed body member.

The False Claims Act contains a whistleblower provision that allows a private individual to file a lawsuit on behalf of the government and entitles that individual to a percentage of any recoveries. Employees, contractors and agents of Seattle Children's who report the submission of false or fraudulent claims are protected from employment-related retaliation.

Penalties for violating the False Claims Act may include:

- Civil penalties of up to \$21,563 for each false claim, plus three times the amount of the damages sustained by the government.
- Exclusion from participation in federal healthcare programs.

Violations may also give rise to criminal penalties, including imprisonment and criminal fines.

Anti-Kickback Statute – 42 U.S.C. § 1320a-7b(b)

This criminal statute prohibits the knowing and willful solicitation or reception of "remuneration" to induce or reward patient referrals or the generation of business involving any item or service payable by a federal health care program. "Remuneration" includes anything of value, including cash, cash equivalents, excessive compensation, and gifts. Criminal and civil penalties for violating this law may include fines, imprisonment, exclusion from participation in federal health care programs, and further liability under the federal False Claims Act. State laws also maintain various prohibitions against kickbacks.

Physician Self-Referral Law - 42 U.S.C. § 1395nn

Commonly referred to as the "Stark Law," this federal civil statute prohibits a physician (or an immediate family member of such physician) who has a financial relationship with an entity, including a hospital, from referring patients to the entity for certain designated health services reimbursable by a federal health care program, unless the financial relationship satisfies a statutory or regulatory exception. Financial relationships between physicians and entities include ownership interests, investment interests, and compensation arrangements. If a financial relationship does not qualify for an exception and a proscribed referral occurs, the entity is prohibited from submitting a claim for the service to a federal health care program.

Civil sanctions for submitting claims in violation of the Stark Law are substantial, including denial of payment, required refunds of the amounts collected in violation of the law, civil penalties of up to \$15,000 for each improper claim, and further liability under the federal False Claims Act.

Civil Monetary Penalties Law – 42 U.S.C. § 1320a-7a

This law includes a prohibition against offering or transferring anything of value to a beneficiary of a government health care program that the person knows or should know is likely to influence such individual to order or receive any items or services payable under the government health care program from a particular provider, practitioner or supplier. Hospitals are also prohibited from knowingly making a payment to a physician as an inducement to reduce or limit medically necessary services to beneficiaries of government health care programs. The law also identifies a number of circumstances where offering or transferring items or services to patients or providers will not constitute a violation.

Emergency Medical and Active Labor Act – 42 U.S.C. § 1395dd

Under this federal statute, if any individual comes to a hospital with a dedicated emergency department and a request is made on the individual's behalf for examination or treatment for a medical condition, the hospital must provide for an appropriate medical screening examination within the emergency department's capability to determine whether or not an emergency medical condition exists. If an emergency medical condition exists, the hospital must provide either such further medical examination and treatment as may be required to stabilize the medical condition, or for a necessary and appropriate transfer to another medical facility. A hospital may not delay provision of an appropriate medical screening examination or further treatment in order to inquire about the patient's method of payment or insurance status.

Conditions of Participation (CoP) or Conditions for Coverage (CfC)

The Centers for Medicare and Medicaid Services develops these requirements to identify the minimum standards health care organizations must meet to maintain quality and protect patient health and safety. Hospitals and other providers must comply with these standards to maintain their ability to participate in Medicare and Medicaid programs.

State Law

In addition to the requirements imposed by federal statutes and regulations, Seattle Children's must comply with certain laws maintained by the states in which we operate. Washington and other states have laws that complement and expand the scope of some of the federal requirements discussed above, including the federal False Claims Act, the anti-kickback statute and the Stark law. For example, a Washington statute that applies to Medicaid mirrors the federal Stark law, applying identical proscriptions to referrals of Medicaid patients. Washington also maintains several statutory prohibitions that create criminal and civil penalties for the knowing submission of false claims to the Medicaid program. The following sections discuss these laws in greater detail. State laws feature their own penalties, meaning that certain conduct affecting both state and federal health care programs can give rise to sanctions under state and federal law.

Civil Penalties – Medicaid Fraud False Claims Act – RCW 74.66.005-.130

Washington's Medicaid Fraud False Claims Act prohibits any person or entity from submitting a false or fraudulent claim to the Medicaid program. Under the law, any person who:

- knowingly presents, or causes to be presented, a false or fraudulent claim for payment or approval;
- knowingly makes, uses, or causes to be made or used, a false record or statement material to a false or fraudulent claim;
- is authorized to make or deliver a document certifying receipt of property used, or to be used, by the government entity and, intending to defraud a government entity, makes or delivers the receipt without completely knowing that the information on the receipt is true;
- knowingly makes, uses, or causes to be made or used, a false record or statement material to an obligation to pay or transmit money or property to the government entity, or knowingly conceals or knowingly and improperly avoids or decreases an obligation to pay or transmit money or property to the government entity; or
- conspires to commit one or more of the above listed violations is liable for three times the amount of the state's damages, plus a civil penalty of up to \$11,000.

Like the federal False Claims Act, Washington's law permits private whistleblowers to bring a civil action on behalf of the state to recover the funds paid as a result of false claims. If the suit succeeds, the whistleblower may be awarded a percentage of the funds recovered. Employers are prohibited from discharging, demoting, suspending, threatening, harassing, or otherwise discriminating against an employee, contractor, or agent for lawfully disclosing information regarding a false claims action against the employer.

Criminal Penalties – False Statements and Fraud – RCW 74.09.230

Washington also maintains a separate law that criminalizes certain fraudulent activities in connection with any Washington health care benefit program, including Medicaid. Under the statute, it is a felony for any person or institution to knowingly make or cause to be made any false statement or representation of material fact:

- In any application for payment under any Washington health care benefit program; or
- For use in determining rights to such payment.

It is also a felony to:

- Falsify, conceal or cover up by any trick, scheme, or device a material fact in connection with such application or payment.
- Conceal or fail to disclose the occurrence of any event affecting the initial or continued right to any payment, with an intent fraudulently to secure such payment either in a greater amount or quantity than is due or when no such payment is authorized.

The statute also provides for fines up to \$25,000 and certain remedies to whistleblowers who experience reprisals or retaliation for reporting suspected violations to government authorities.

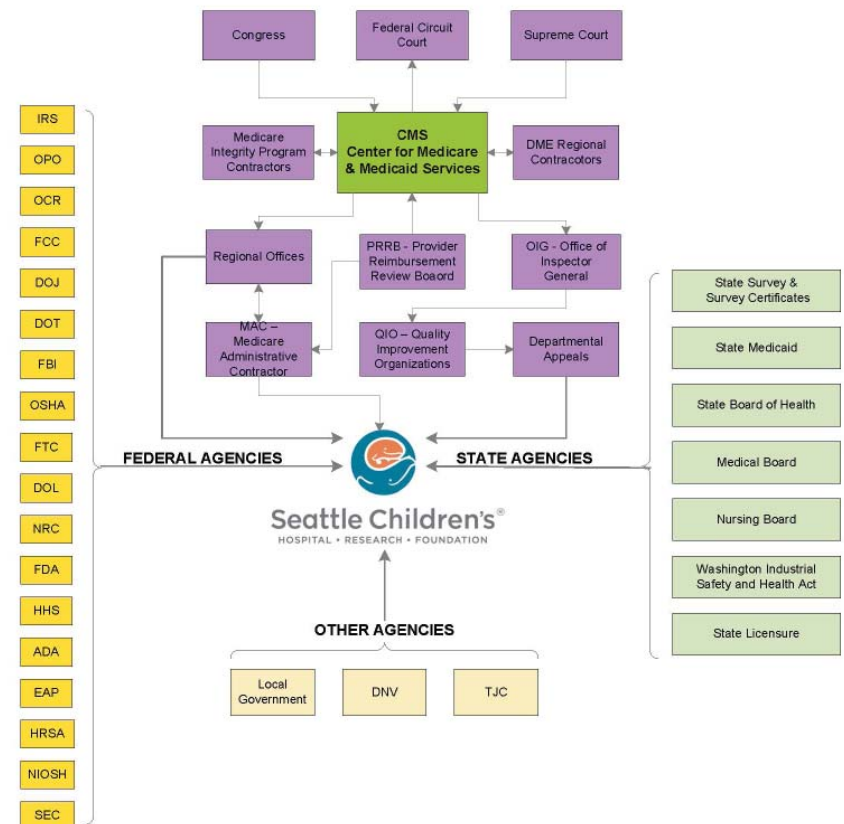


Did you ever wonder who Children's is accountable to? See the image below for the federal, state, local and miscellaneous agencies the govern Seattle Children's activities.

COMPLIANCE IS NOT ONLY IMPORTANT FOR SEATTLE CHILDREN'S, IT'S MANDATORY!

Corporate Compliance Overview

Who regulates Seattle Children's?



Responsible Conduct Within Research

Seattle Children's Research Institute strives to conduct research responsibly. This involves:

- Protection of human research participants
- Ethical treatment of animal research subjects
- Assurance of environmental health and workplace safety for researchers
- Financial stewardship, administration and management of research awards
- Identification and management of financial conflicts of interest

All employees and agents of Seattle Children's who are engaged in research are expected to conduct research in compliance with federal, state and local laws, as well as institutional policies and procedures.

The Office of Research Compliance works with the Corporate Compliance Program to foster a culture of compliance and encourage and enhance the efforts of employees and agents to achieve the highest level of integrity. It does so by performing compliance research risk assessments, auditing and monitoring research related activities, conducting effective education and training programs, developing research policies and procedures, and promptly investigating all reported research compliance concerns (See page 12 "How do I report an issue").

For more information on the research compliance program, go to the Research tab on CHILD, click Center Support Services and choose Office of Research Compliance in the left hand column. Research policies and procedures can be found by clicking on the Forms & Policies under the Research tab on CHILD.

You may direct research compliance questions to the Office of Research Compliance at researchcompliance@seattlechildrens.org



Compliance Helpline: 1-877-483-3049
EthicsPoint: From CHILD Applications, click on Compliance Reporting

You have a duty to report potential compliance concerns - speak up if you see or suspect activity that may violate our Code of Conduct.

Reporting

What do I report?

Compliance issues can be complex and knowing when to report a potential issue is not always easy. Ask yourself these questions when you see a possible violation:

- Does the action seem right?
- Is it inconsistent with Seattle Children's policies and procedures?
- Is it ethical behavior?
- How would the action look to family, friends, patients, and/or community if published in the newspaper or other media outlets?

If you are still unsure after considering these questions, you should promptly discuss compliance concerns with your supervisor, Corporate Compliance Department, the Compliance Helpline or you can submit an online form on CHILD using Ethics Point.

How do I report an issue?

You have an obligation to report all suspected violations of the Code of Conduct, any law or regulation, or Seattle Children's policies, by taking any of the following actions:

1. Talk to your immediate supervisor.
2. If that does not seem appropriate, go to the department leader or another trusted manager or leader at Seattle Children's.
3. Call the Compliance Helpline, report using the online form through CHILD, or contact the Corporate Compliance Officer directly at 206-987-5220.

Compliance Helpline: 1-877-483-3049
EthicsPoint: From CHILD Applications, click on Compliance Reporting

How to make anonymous reports

Potential violations and other compliance concerns can be reported anonymously if you desire. We have partnered with EthicsPoint, an external company, to provide a mechanism for anonymous reporting. Those who wish to report a violation can call and talk to a live person, or type in their concern through the online form. The compliance hotline is available 24 hours a day, seven days a week and the online form is readily accessible through CHILD.

- Compliance Helpline: (877) 483-3049
- Online form through CHILD on the landing page. Click on “compliance reporting” in the Applications menu

If you choose to make an anonymous report, be prepared to provide enough information about the situation to allow it to be properly investigated.

Reports filed either through the Compliance Helpline or through the online form will be assigned a unique number that may be used to check the status of the report.

Confidentiality

Seattle Children’s takes seriously the importance of confidentiality in matters involving potential compliance violations. If you call the Compliance Helpline or use the online form, you will receive a case number that will enable you to track our effort to address your concern.

Non-Retaliation for Reporting Issues

Seattle Children’s encourages all members of its workforce to identify and report compliance concerns using the communication methods described in this Code of Conduct. Workforce members who raise concerns about compliance with laws, regulations, policies or procedures are protected from retaliation.

Auditing and Monitoring

Auditing and monitoring is an important component of an effective compliance program. To help ensure Children’s compliance with all applicable laws and regulations, we will perform periodic compliance audits. Audits in identified risk areas will be more frequent and detailed. The Compliance Officer and a group of internal staff members, as well as external auditors (as needed), will conduct the audits. When complete, the audit results will be presented to the Compliance Committee and the affected department.

Frequently Asked Questions:

1. When should I use the Compliance Helpline or submit questions online?

Anytime.

2. What happens after I report a violation?

Seattle Children’s will promptly investigate all reports. Investigations will be as confidential as possible. The Compliance Officer will coordinate findings and recommend changes that need to be made to fix identified problems.

3. Will I get in trouble for reporting a violation?

No. Seattle Children’s policy, as well as federal and state laws, described in these materials, prohibit any retaliation or harm to the reporting person. In fact, Seattle Children’s wants to know of all potential violations.

Disciplinary Process/Corrective Action

Seattle Children’s does not tolerate behavior that violates the Code of Conduct, any law or regulation, or Seattle Children’s policies. Where an internal investigation substantiates a reported violation, Seattle Children’s will initiate as appropriate, refunding overpayments, notifying government agencies and taking disciplinary action up to and including immediate suspension and/or job termination. In addition, employees who violate certain laws may be subject to legal prosecution.

Management’s Compliance Obligations

Management plays an important role in promoting our culture of compliance and is expected to reinforce and model ethical behavior. Management is held accountable for failure to comply with the Code of Conduct, applicable laws, regulations and internal policies.

Protecting Confidential Information

Protected Health Information (PHI)

Federal and state laws impose specific requirements and restrictions on the use of protected health information (PHI). Seattle Children's requires that all members of its workforce take privacy and information security training in order to more clearly understand their responsibilities. Remember, all who work at Seattle Children's are responsible for maintaining the privacy and security of PHI in all forms; oral, written and electronic.

Other Confidential Information

Seattle Children's also creates and uses many other kinds of confidential information to conduct business. Examples include strategic plans, contracts, budgets, salaries and personal information about employees. These types of information are to be viewed and used only by the individuals who need them to do their jobs.

Information Systems and Data Security

Much of Seattle Children's PHI is stored in electronic form. Many of Seattle Children's large computer applications contain information that is used for patient care and related activities (treatment, payment and hospital operations). Just as with paper or oral communications, you are responsible for making sure that electronic information about patients and research participants is protected from unauthorized access, modification or theft.

It is also your responsibility to keep Seattle Children's business information confidential. Any attempt to inappropriately access or share confidential information, including PHI, may be subject to disciplinary action, up to and including termination.

It is a violation of policy to:

- Share your user ID user name and password for any Seattle Children's system;
- Seek or share confidential information that is outside the scope of your job responsibilities;
- Access information for others who are not authorized to obtain that information;
- Breach or attempt to breach the security of any Seattle Children's information system or confidential data; or
- Leave computers or media containing patient or other confidential information unsecured.

All workforce members sign a confidentiality agreement before they receive access to Seattle Children's network and information systems. Your access to electronic information may be monitored to assure compliance with Seattle Children's privacy and security policies.

We Are All Responsible

Protecting the privacy and security of PHI and other confidential information is:

- Everyone's responsibility.
- The right thing to do!
- The law.

Never access or disclose PHI or any other type of confidential information except as needed to perform your job; share confidential information only with authorized individuals.

Information Security Program

Privacy and Information Security policies can be easily found by selecting the Policies and Standards tab at the top of the CHILD home page, then selecting Policies and Procedures. From this page you may search all policies using key words or select Privacy and Information Security or Information Services from the categories displayed on the left-hand side of the page.

Direct specific privacy questions to the Privacy Help Line, 206-987-1200, or via email: privacy.questions@seattlechildrens.org. Direct information-systems security questions to the IS Service Desk, 206-987-1111.

Business Standards



Billing and Documentation Practices

Accurate billing and submission of claims are top priorities for Seattle Children's. We must follow billing laws and regulations to be appropriately paid for our services. Clinical records must contain complete and accurate documentation necessary to support all claims. Failure to follow proper procedures can result in improper billing, which may lead to civil and criminal liability for Seattle Children's as well as individual employees.

We want to know when errors are found, and we encourage you to report them so corrections and education can occur. The deliberate submission of charges or claims for reimbursement that are false, inaccurate, incomplete or duplicate is strictly prohibited.

If you discover a billing error, you should notify your supervisor or Revenue Cycle immediately by emailing the details of the error to "Charge Corrections". It is important for Seattle Children's to learn of billing errors and fix them as well as any system problems that may have caused the error.

If we do not do so, the government may consider ongoing errors to be false claims. Under the False Claims Act (see page 5), Seattle Children's may face civil and criminal penalties.

If you have concerns about any charges submitted from your department you should contact your supervisor, the Revenue Cycle Director or call the Compliance Helpline at 1-877-483-3049.

You will not get into trouble for reporting your good faith concerns. You are protected by law and also by Seattle Children's non-retaliation policy. See page 12 for how to report.

Compliance Helpline: 1-877-483-3049
EthicsPoint: From CHILD Applications, click on Compliance Reporting

Patient Billing and Resolution of Conflicts

Seattle Children's requires that charges for services shall be standard for all patients and payers. Claims are submitted in accordance with government program regulations, payer contract requirements, and industry standards. Questions from patients or payers are reviewed and responded to.

Billing complaints are handled through established procedures. Children's general credit and collection procedures comply with the Fair Debt Collection Practices Act. We prohibit harassment in our debt collection efforts.

Conflict of Interest

As a Seattle Children's workforce member or individual with decision-making authority with respect to the organization, you are expected to avoid or appropriately manage situations that might cause your personal interests to conflict with those of Seattle Children's or to compromise Seattle Children's reputation for integrity.

A conflict of interest may arise if your outside activities, personal financial interests, or other private interests or those of an immediate family member interfere or appear to interfere with your ability to make objective decisions in your position on behalf of Seattle Children's.

We care about the outcome, as well as how it is achieved. If you have a question about whether an activity, relationship or involvement might create a conflict of interest, contact your supervisor, the General Counsel or call the Compliance Helpline at 1-877-483-3049.

Gifts

Seattle Children's workforce is responsible for keeping relationships with vendors, non-employed providers, students, and patients and their families impartial and avoiding the appearance that our judgement and decisions can be influenced by gifts or entertainment. Seattle Children's workforce shall not accept gifts, meals, entertainment, or offers of goods and services that have more than a nominal value or are otherwise inconsistent with Seattle Children's Gift Acceptance policy. Workforce members are also prohibited from soliciting gifts from vendors, suppliers, contractors or other persons which might influence or appear to influence decisions or actions. If you have a question about whether a gift should be accepted, contact your manager or call the Compliance Helpline at 1-877-483-3049.

Compliance Helpline: 1-877-483-3049
EthicsPoint: From CHILD Applications, click on Compliance Reporting

Antitrust

Seattle Children's is committed to competing fairly and complying with all laws, including all antitrust laws. Antitrust laws prohibit actual or attempted agreements and arrangements that limit or restrict competition. This includes agreements to fix prices, collusion (including price sharing) with competitors, dividing geographic markets, boycotting and certain unfair trade practices. Unwritten or informal agreements are also subject to the antitrust laws. Antitrust violations are serious and may result in criminal charges, significant fines and/or imprisonment. Antitrust is a complex area. If you have any questions or concerns about whether a practice may raise antitrust concerns, contact the General Counsel.

Government Investigations and Legal Actions

If you are approached by any person who identifies himself or herself as a government investigator, you should contact the General Counsel's office immediately at 206-987-2044. Notify the person taking the call that you are reporting a potential government investigation.

If you receive a subpoena or other written request for information related to a government investigation contact the General Counsel's office immediately. Do not respond directly to such requests or subpoenas.



Copyrights, Patents and other Intellectual Property

Seattle Children's retains the right to all copyrights, patents, and other intellectual property developed by staff and employees that involve Seattle Children's facilities, funding, services, conditions of employment or assignment of duties.

The rights to inventions and discoveries conceived or developed by staff and employees of Seattle Children's will be assigned by agreement to Seattle Children's.

You are required to report to your department director all inventions and discoveries conceived or developed in connection with your work or that involve Children's facilities, funding, or services. Your director will work with you to make the appropriate invention disclosure.

Patient Care Standards

Admission, Transfer and Discharge

At Seattle Children's, a pediatric patient in need of medical care is admitted without discrimination on the basis of race, gender, creed, ethnicity or disability. Patients who enter our system are carefully assessed at the time of entry and placed in a patient care area that best meets their clinical needs.

Transfer to another unit or service is determined by the patient's clinical condition, matched to the admission and discharge criteria of the specific units. Diversion to another health care facility occurs only after a child's condition has been assessed, and we are unable to match their needs based on bed availability, adequate and trained staff, technology or necessary equipment.

Patient's Right to Protective Services

Under Washington state law, all professional staff are obligated to make a report to the proper authorities if they have reasonable cause to believe that a child has suffered abuse or neglect. Seattle Children's provides resources to help determine the need for these services and, if requested, a list of advocacy groups.

Patient Care Decision Dilemmas

Individuals with knowledge and training in medical ethics are available for consultation on a 24-hour, 7-day-a-week basis to patients, family, staff or health care providers through the paging operator at 206-987-2000.

Integrity of Clinical Decision Making

Clinical decisions are based on identified patient health care needs. The integrity of clinical decision making is maintained, regardless of how leaders, managers, clinical staff or licensed independent practitioners are compensated and/or share financial risk.

Staff Request to Not Participate in Aspect of Care

Seattle Children's respects a staff member's request not to participate in an aspect of patient care that infringes on his or her cultural values, ethics or religious beliefs. The medical needs of patients and their overall well-being take precedence, however, so that care, treatment and services are not negatively affected. Please refer to our internal policy for additional information.

Hospital Staff Right to Notify DNV-GL Healthcare

Employees have the right to report to DNV-GL Healthcare concerns about the safety or quality of clinical/medical care provided at Seattle Children's.

Concerns may be reported to DNV-GL Healthcare via any of the following:

- Online form: <http://dnvglhealthcare.com/patient-complaint-report>
- Telephone: 866-496-9647
- Fax: 513-947-1250

Children's will take no disciplinary action against the person for good faith reporting.

Home Care Staff Right to Notify The Joint Commission

Employees have the right to report to The Joint Commission via any of the following:

- Telephone 800-994-6610
- Fax; 630-792-5636
- Email: complaint@jointcommission.org
- Mail: One Renaissance Blvd., Oak Terrace, IL 60181

