

# Our Values in Practice. We Serve.



# Contents

<b>Our Message to You</b>	2
<b>Our Inspiration</b>	2
<b>Our Code</b>	3
• Getting to Know the Code	4
• Understanding Your Responsibilities	5
• Making Good Decisions	5
• Reporting Concerns	6
• No Retaliation	7

## Integrity

• Complying with Laws and Regulations	11
• Working with Physicians and Other Referral Sources	12
• Avoiding Conflicts of Interest	13
• Maintaining Proper Relationships	14
• Responding to Government Investigators	15

## Compassion and Collaboration

• Sustaining Quality of Care and Patient Safety	17
• Protecting Patient Rights	18
• Safeguarding Protected Health Information	19

## Accountability

• Appropriately Using Parkland Assets	21
• Protecting Confidential Information	22
• Keeping Accurate Business Records	23
• Complying with Billing and Coding Requirements	24
• Representing Parkland	25
• Conducting Responsible Research	26
• Protecting Research Participants	27

## Respect

• Maintaining a Safe Environment	29
• Fostering a Positive Workplace	30
• Serving in our Communities	31

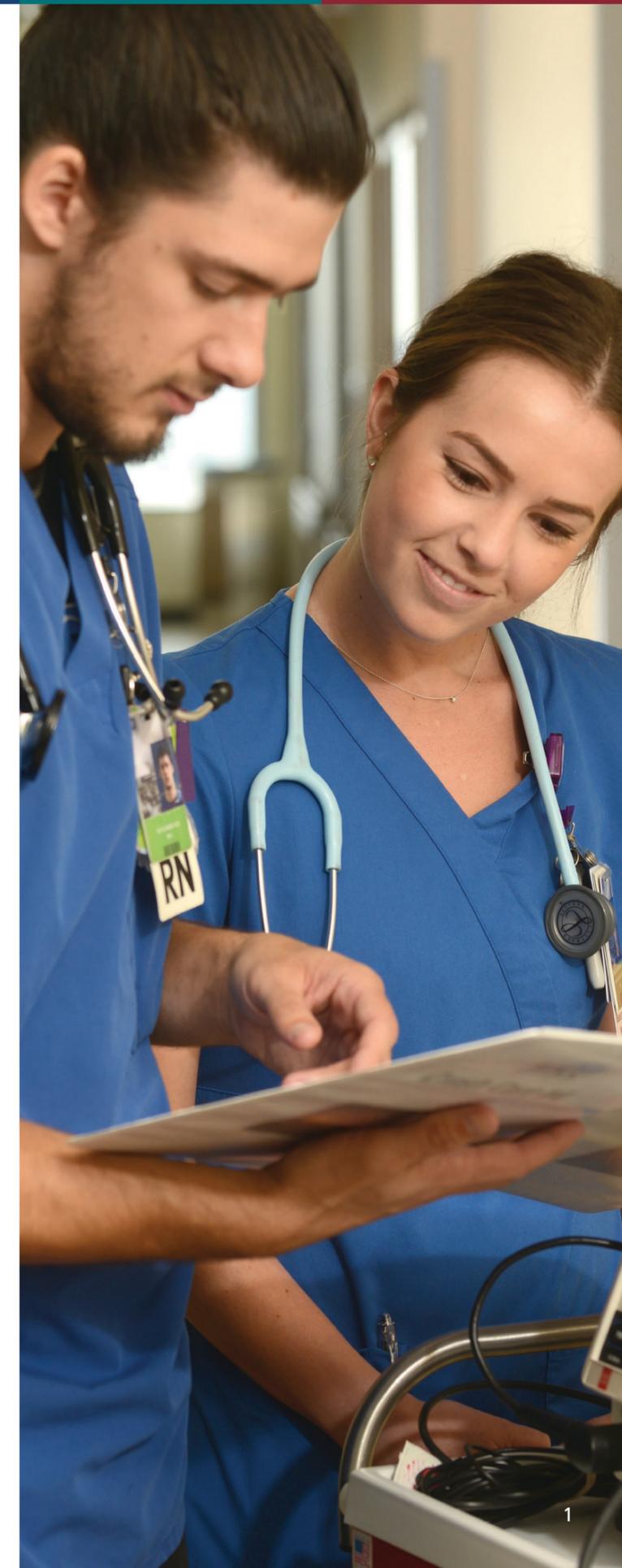
## Equity

• Promoting Diversity and Inclusion	33
• Anti-Discrimination	34
• Substance Abuse	34

<b>Our Commitment</b>	33
-----------------------	----

<b>Our Resources</b>	33
----------------------	----

*Throughout this document, any references to Parkland refer to Parkland Health and its Controlled Affiliates. Any references to the Code refer to the Parkland Code of Conduct and Ethics.*



# Our Message to You

For more than a century, Parkland has provided healthcare services to the Dallas County community. From our humble beginnings in wood frame buildings to the new 2.8 million square-foot, state-of-the-art campus, our charge remains the same – to serve our community.

I am proud to be part of the Parkland team, proud to be associated with our results, and proud that we are always looking for ways to be better. This enables us to continue to provide great care to those who depend so greatly on us.



As we continue to define the standards of excellence in public healthcare, we must ensure we deliver compassionate, high-quality care, as well as act with integrity.

The Code is our tool for guiding decisions and interactions with each other. I encourage you to read the Code carefully. If you have any questions, contact the [Compliance and Ethics Department](#).

If you know of unsafe practices, unethical behavior or violations pertaining to the Code, a Parkland policy or procedure, or any applicable law or regulation, you are responsible to [speak up](#) and [report](#) your concerns.

While the Code won't address every situation you might face, it's a great source of reference and will help you integrate Parkland's values into everyday practice. Your commitment to uphold the Code is vital to building public trust and confidence in Parkland.

**Fred Cerise, MD, MPH**  
President and Chief Executive Officer

# Our Inspiration

Parkland is a safety-net provider of medical services, providing equitable access to high - quality care for all people residing in Dallas County.

Compassionate care is at the heart of everything we do – it is our purpose for being.

## Our Mission

Advance Wellness  
Relieve Suffering  
Develop and Educate

## Our Vision

We will advance health equity through excellence as a public health system.

## Our Values

Serving as our culture's cornerstone, Parkland's values are those inherent principles that guide our organization and are reflected in our employees actions.



## OUR VALUES IN PRACTICE

**INTEGRITY** — I will be honest, trustworthy, authentic, humble, and transparent.

**COMPASSION AND COLLABORATION** — I will provide service in a spirit of empathy, concern and love. I will work together with others to deliver excellent care for our community.

**ACCOUNTABILITY** — I will hold myself and others responsible for high standards of excellence, stewardship, and will welcome feedback.

**RESPECT** — I will value the unique and diverse experiences of others and treat everyone with kindness and humility.

**EQUITY** — I will value the diversity of patients and colleagues and strive to promote everyone's health, dignity, and voice.

## Applicability

This Code applies to all Workforce Members of Parkland Health and, unless otherwise noted, its affiliate organizations. Workforce Member means an officer, board member, volunteer, member of the medical staff, contractor, vendor, trainee, or other person whose conduct, in the performance of work for Parkland, is under the direct control of Parkland or a Parkland affiliate, whether or not he or she is paid by Parkland or a Parkland affiliate.

### Special Considerations and Exceptions

Each Parkland affiliate organization has a unique purpose and serves the Dallas County community in different ways. As such, the affiliates may encounter situations that require special consideration to fulfill regulatory or operational needs. These situations may necessitate deviation from the standard requirements of the Code. For example: Workforce Members of PCHP are not permitted to accept gifts of any kind from any source; and the Code guidance regarding solicitation is not applicable to the Foundation.

Exceptions to the Code may be granted in accordance with the Parkland Code of Conduct Policy.

Questions regarding special considerations or exceptions should be directed to the [Compliance and Ethics Department](#).

### About the Parkland Affiliate Organizations

The Parkland Center for Clinical Innovation (PCCI), Parkland Community Health Plan (PCHP) and Parkland Foundation are affiliate organizations of Parkland Health.

PCCI is an advanced, nonprofit healthcare analytics research and development organization with a collaborative team of expert data scientists and knowledgeable healthcare professionals who go beyond analyzing medical data to examining the social determinants of health to develop new ways to more effectively manage health and wellbeing at the individual and population level.

PCHP is a managed care organization designed to help members access convenient affordable and quality healthcare services through its network of physicians, hospitals and urgent care centers.

Parkland Foundation is dedicated to securing substantial financial resources that advance the goals of Parkland Health. The Foundation's chief purpose is to solicit funds from individuals and organizations on behalf of Parkland Health.



# Our Code

## In this section:

- Getting to Know the Code
- Understanding Your Responsibilities
- Making Good Decisions
- Reporting Concerns
- No Retaliation



# Getting to Know the Code

The Code helps us put our values into practice. Let Parkland's values shine through in every action you take. It is important that you understand the Code and know how it applies to you. If you do not find the information you're looking for in the Code, contact the [Compliance and Ethics Department](#).

The Parkland Board of Managers (Board) approves the Code. The Compliance and Ethics Department periodically reviews the Code and presents proposed updates for the Board's review and consideration, as needed, to sustain accuracy and relevancy.

## Who must follow the Code?

If you work for or on behalf of Parkland you are considered a Workforce Member and the Code applies to you.

Our Code and Parkland policies give you the information you need to perform your job. You are expected to know our Code and our policies and follow them.

## When violations happen

When someone's actions violate our Code, our policies or procedures or applicable laws or regulations, it can harm both Parkland and our patients.

We take any potential violation seriously. When we learn about possible misconduct, we review it carefully and take appropriate steps to correct, and when appropriate, to also impose disciplinary action. If a law is violated, the result could be civil or criminal action against Parkland and the person responsible.



# Understanding Your Responsibilities

Demonstrate Parkland-worthy behaviors by modeling Parkland’s values in everything we say and do. We each have an individual responsibility to perform our duties in a manner consistent with the requirements in our Code. Know the Code – read it and follow it.

## Ask yourself...

- Are my decisions and actions based on the mission, vision and values of Parkland?
- Do I make good decisions?
- Do I act responsibly, professionally and ethically?
- Do I communicate respectfully and honestly?
- Do I consistently follow Parkland’s policies and procedures?
- Do I demonstrate compliance with applicable laws and regulations?

## Managers and leaders have additional responsibilities:

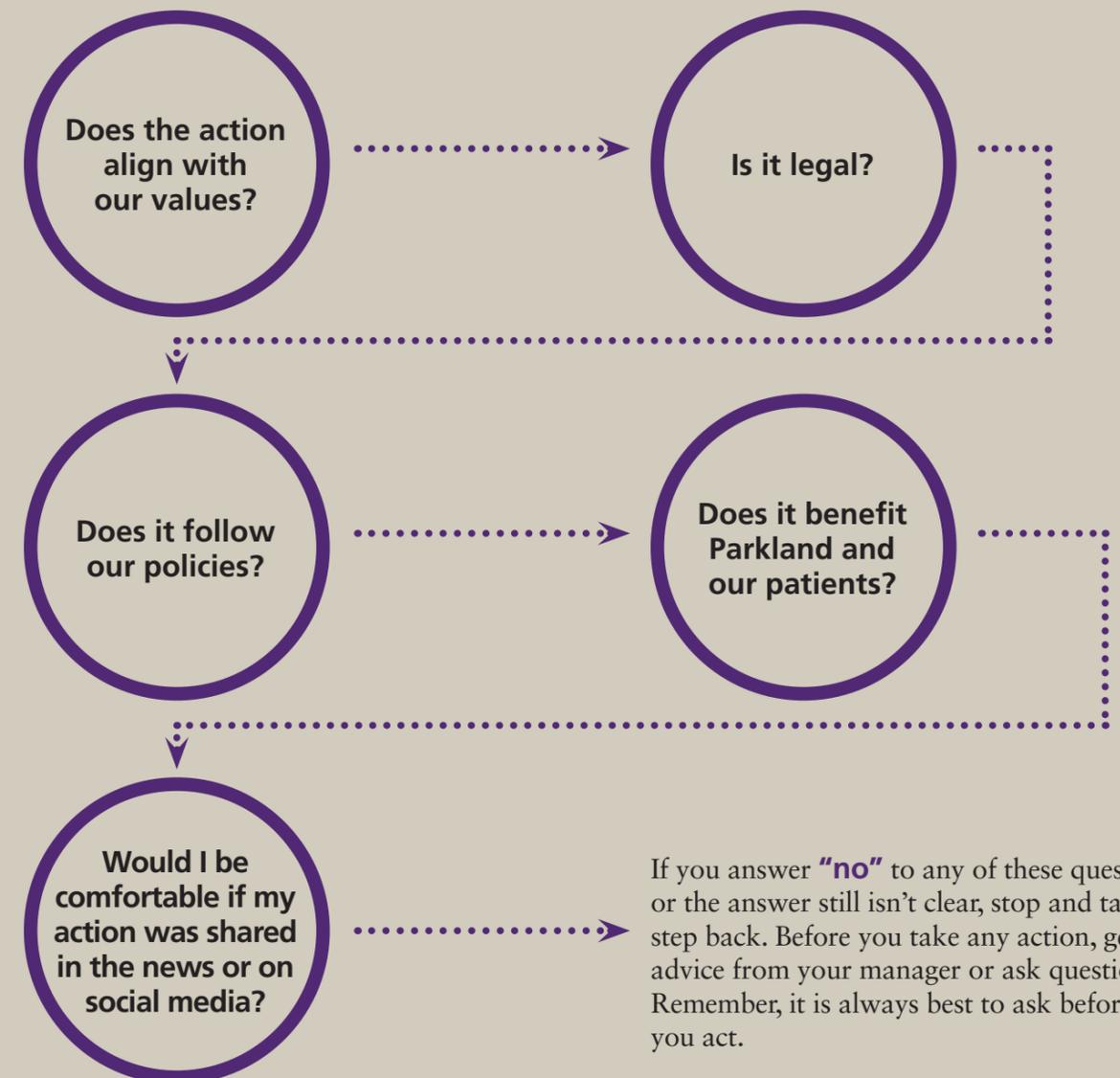
- Be Parkland-worthy.**  
Do what is right, setting the example for others to follow.
- Promote the Code.**  
Ensure employees are actively applying its principles, and understand the policies, laws and regulations that apply to each staff member’s work.
- Be approachable.**  
Be available, maintaining an environment where individuals can comfortably ask questions or raise concerns.
- Give feedback.**  
Be respectful, providing appropriate and timely responses to questions or concerns.
- Take action.**  
Assess developing circumstances quickly and accurately, keeping the Compliance and Ethics Department promptly informed of compliance and ethics concerns.

# Making Good Decisions

Every day we make choices while serving thousands of patients. Patients depend on us to get their care right, and that puts real pressure on us. You handle that pressure because you’re talented and you care. Combine that with self-awareness and humility, and you recognize where we have opportunities to improve and work as a team for the benefit of our patients.

We all have a role to play to care for the residents of Dallas County. The consequences of our actions or inactions are important.

**Doing what’s right is in our DNA. But there may be times when the right choice isn’t clear. If that ever happens, begin by asking yourself:**



# Reporting Concerns

Parkland is committed to taking your concerns seriously. You have the responsibility to promptly report potential violations of applicable law, regulation, policy or procedure. You are protected from retaliation if you make a report in good faith. In “good faith” means that you believe the information is true and reported without omission, including the extent of your own involvement, if applicable.

Concerns may involve situations related to patient care, compliance or business ethics or workplace issues.

**Speak up.** Speak up when something isn’t right. It’s always the right thing to do – even if you’re not sure that misconduct has occurred.

**How do I speak up?** Involve your supervisor, manager or any other appropriate member of leadership who can address and resolve the issue. If you need additional help to resolve the issue, move up the chain of command.

- **Contact your Talent Management Business Partner.** If your concern is a workplace related issue that cannot be resolved in your chain of command, call your Talent Management Business Partner.
- **Contact the Compliance and Ethics Department.** If your concern is a compliance or business ethics issue that can’t be resolved in your chain of command, call the [Compliance and Ethics Department](#).
- **Contact the Parkland Integrity Line.** You may also report a concern anonymously by telephone or internet. We will not attempt to identify anonymous reporters.

These two options are available 24 hours a day, 7 days a week:

**File a report using the internet at** [www.parklandintegrityline.ethicspoint.com](http://www.parklandintegrityline.ethicspoint.com)

**Call the Integrity Line**  
(toll-free) 800-351-0093

Never be afraid to report!

Reports made to the Parkland Integrity Line are received by professionals employed by an outside vendor who are trained to document the information you provide. When you submit a report, you will receive a personal identification number called a Report Key. Please retain your Report Key to check on the status of your report.

**Cooperate and be truthful.** If you are called upon to participate in any investigative activities regarding a reported concern, you are required to cooperate fully and truthfully.

**If you have a concern regarding a patient’s safety or care, then you must file a report through the Safety Center.**

These reports should be filed as soon as possible, but before the end of your work shift. If you are involved in, or become aware of, a serious patient safety event, promptly page the on call Patient Safety/Risk Manager via the Smart Web On Call Directory.

If you are aware of a patient requesting to file a complaint, direct the patient to contact the [Patient Relations Department](#).



## What’s the Diagnosis?

**Q** – *What’s the difference between “anonymity” and “confidentiality?”*

**A** – *Anonymity means that the reporter’s identity has not been revealed to anyone, including the investigator. However, sometimes the very nature/content of a report can unintentionally identify the reporter.*

*Confidentiality, meanwhile, means that the identity of the reporter is known to the investigator but is not shared with anyone else unless it becomes critical to do so for the case review to be processed effectively. Even so, this will only be done on a “need-to-know” basis and the reporter will be notified prior to disclosure whenever possible.*

### Workplace concerns include:

- Difficulties between you and a co-worker
- Failure to follow employment-related departmental policies and procedures
- Scheduling or wage and hour related disagreements
- Unresolved performance issues
- Acts of discrimination based on race, color, national origin, sex, sexual orientation, gender, gender identity, religion, age (over 40), disability, military or veteran status
- Harassment
- Denial of request for reasonable accommodation related to medical condition, disability or religion
- Suspicion someone is working under the influence of controlled substances, including alcohol

### Compliance & Business Ethics concerns include:

Any workplace concern that has previously been reported to another member of management, leadership or [Talent Management Business Partner](#) within the Office of Talent Management, but is not resolved.

You believe that you or another Parkland employee/contractor has...

- Been the subject of retaliation for reporting a concern in good faith
- Inappropriately received or provided something of value, such as supplies, equipment, gifts or gratuities from a Vendor, Community Partner, Patient/Prospective Patient, Referral Source, etc.
- Accepted travel accommodations (airfare, lodging, etc.) from an entity that conducts business with Parkland
- Improperly billed or coded patient accounts
- Submitted false, inaccurate or questionable claims to Medicare, Medicaid or any other payer
- Falsified, inappropriately altered or destroyed official Parkland documents (paper or electronic)
- Improperly disclosed protected patient information

### Tell Me More

For more information, visit:

[Integrity Line Procedure](#)

[Reporting Obligations Policy and Procedure](#)

[Safety Center Reporting Procedure](#)

[Internal Investigations Policy](#)



# No Retaliation

We understand you need to feel comfortable and confident when sharing your concerns – not worrying about possible retaliation.

Parkland does not tolerate retaliation of any kind against anyone who shares a concern sincerely and in good faith.

You will not face disciplinary action or retaliation when you, in good faith, report a possible issue, problem, concern, or violation to management, the [Office of Talent Management](#), the [Compliance and Ethics Department](#), the [Integrity Line](#) or the [Safety Center](#). That includes acting as a whistleblower in accordance with the Federal False Claims Act or other law.

The False Claims Act provides protection against retaliation for whistleblowers who have been discharged, demoted, suspended, threatened, harassed or otherwise discriminated against in the terms and conditions of employment by their employer in retaliation for filing a False Claims Act action.

## Tell Me More

For more information, visit:

[Deficit Reduction Act  
\(False Claims Act\) Policy](#)

[Non-Retaliation Policy](#)



## It's in Our DNA

*We will not discharge, demote, suspend, threaten, harass or discriminate against anyone for reporting a concern in good faith.*

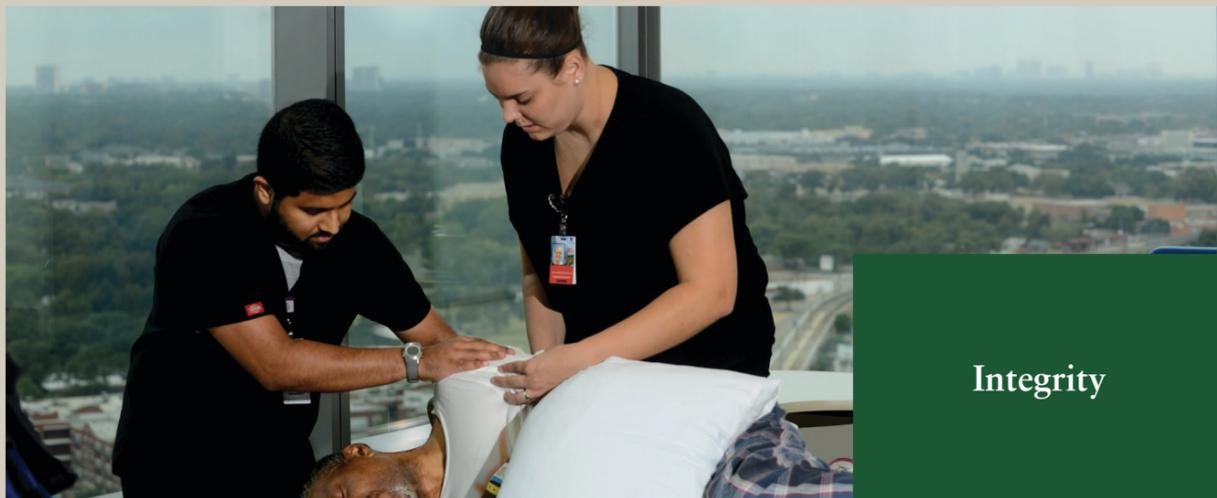




# Our Values in Practice



Accountability



Integrity



Respect



Compassion & Collaboration



Equity

# Integrity

Trust isn't something we expect – it's something we earn.

## In this section:

- Complying with Laws and Regulations
- Working with Physicians and Other Referral Sources
- Avoiding Conflicts of Interest
- Maintaining Proper Relationships
- Responding to Government Investigators

*"I will provide service in a spirit of empathy, concern, and love. I will work together with others to provide excellent care for our community."*



# Complying with Laws and Regulations

## We Believe

The way we work is a reflection of who we are, so we work with integrity – always promoting full compliance with applicable laws and regulations.

## Our Commitment

We know compliance is critical to our success, so we uphold the highest standards of ethics and integrity.

We understand and promote full compliance with all of the laws and regulations that apply to us, as well as Parkland policies and procedures.



It's in Our DNA

*We seek to understand and follow all of the laws and regulations that apply to our work at Parkland.*

## What Should I Know?

A variety of laws and regulations apply to our industry, including those that cover:

- The integrity of claims
- Patient referrals
- Competition and marketing practices
- Emergency medical services
- Patient privacy and security of patient information

Violating these laws could expose Parkland and our employees to legal liability, fines and other penalties, including termination.

Know Parkland policies pertaining to the Federal False Claims Act, Texas law regarding civil or criminal penalties for false claims and statements and whistleblower protections under such laws.

## Tell Me More

For more information, visit:

[Compliance with Privacy Requirements Policy](#)

[Deficit Reduction Act \(False Claims\) Policy](#)

[Sanction Screening Policy](#)



## What Should I Do?

### Uphold the Federal False Claims Act.

Watch for and report signs of false claims, such as billing for services not provided, billing for the same service multiple times or making a false statement to obtain payment for a service.

**Uphold the Anti-Kickback Statute.** Never offer to pay anyone for patient referrals. Similarly, do not accept payments or anything of value for referrals that we make. This includes not being rewarded for referrals involving drugs, supplies or healthcare services.

**Uphold Federal and State Government Program Requirements.** This includes Medicare/Medicaid Provider Agreements, Medicare Conditions of Participation, and other applicable licensure/accreditation standards.

**Uphold the Health Insurance Portability and Accountability Act (HIPAA).** Help protect the privacy and security of our patients' personal health information.

**Do not conduct business with ineligible persons.** Individuals are considered ineligible when they have been sanctioned, have a suspended license or have a criminal conviction related to a Federal Health Care Program. Do not hire or conduct business with individuals or entities that have been sanctioned by the Office of Inspector General of the U.S. Department of Health and Human Services (OIG) or appear on any of the following lists:

- OIG's List of Excluded Individuals/Entities (LEIE)
- List of Excluded Individuals/Entities by the Texas Office of Inspector General
- General Services Administration System for Award Management
- U.S. Treasury Office of Foreign Assets Control



## What's the Diagnosis?

**Q** – *What happens if a patient is in an emergency situation, but we haven't gone through the proper procedures to access her insurance information?*

**A** – *In an emergency, the patient's care comes first. We won't delay treatment while we're seeking financial information.*

**Be accountable.** If you become excluded, debarred, or ineligible to participate in a Federal healthcare program, or are convicted of a criminal offense related to the provision of healthcare products or services, you must contact the [Compliance and Ethics Department](#).

**Hire with care.** Make sure all employees, staff and third parties are properly licensed and trained to order services or provide care.

**Do your part.** Speak up about any possible violations of laws or policies and cooperate in internal investigations, audits or reviews.

## Working with Physicians and Other Referral Sources

### We Believe

Assisting patients to connect across the sectors of public health, primary care and community services is vital to improving the continuum of care.

### Our Commitment

We maintain relationships with physicians and other referral sources based only on the needs of our community and in keeping with Parkland's mission.

### What Should I Know?

In accordance with federal and state laws, Parkland prohibits paying for referrals or accepting payment for the referrals we make.

We accept referrals based only on:

- A patient's unique medical needs
- Our capability to provide needed services
- Availability of our resources
- Need for collaborative care

### What Should I Do?

**Do not offer to pay.** Never pay or offer to pay or reward anyone to refer a patient, including colleagues, physicians or any other provider.

**Refuse payments for referrals.** If you are offered any kind of payment for a patient referral, turn it down and report it to the [Compliance and Ethics Department](#) directly or through the [Integrity Line](#).

**Engage referral sources appropriately.** Purchasing goods or services, including clinical services, from a referral source must be in writing and reviewed and approved under applicable laws and regulations and Parkland policies and procedures. A referral source is a person or entity, usually a healthcare provider, who makes or accepts a request for an item or service payable under federal health programs such as Medicare and Medicaid. 42 CFR 411.351, 42 U.S.C. 1320a-7b(b)



### What's the Diagnosis?

**Q** – *I am a social worker. A home health agency sent me tickets to the Mavericks game. Can I keep them?*

**A** – *No. It is never okay to accept anything of value from a company or agency that refers patients to Parkland or accepts referrals from Parkland.*

**Q** – *Can I reward a physician for sending us the most patients?*

**A** – *No. It is never okay to offer rewards or payments to physicians based on referrals.*



It's in Our  
DNA

*We are honest and ethical in our interactions with physicians and other referral sources.*



## Avoiding Conflicts of Interest

### We Believe

Parkland's mission to serve our community is an important responsibility – we always represent the interests of Parkland.

### Our Commitment

Our service to Parkland must be free of undue outside influence, loyalty or desire for personal gain.

### What Should I Know?

A conflict of interest occurs when non-Parkland responsibilities or outside loyalties affect (or appear to affect) your ability to carry out Parkland responsibilities independently and objectively.

#### A conflict of interest might look like:

- Outside employment
- Personal investments
- Personal relationships
- Business opportunities
- Service to other organizations



It's in Our  
**DNA**

*We do not use our position, or knowledge gained in our position, in any way that we could receive personal benefit.*

### What Should I Do?

**Avoid Conflicts of Interest.** Disclose to the [Compliance and Ethics Department](#) any outside interest, activity or relationship that could appear to affect your professional judgment.

Make decisions considering only Parkland's best interests.

- Remove yourself from any Parkland decision that could affect your outside interests or those of family members, business partners or friends.
- Do not ask or attempt to influence others to award Parkland business to a family member, business partner or friend.
- Do not use information gained through your position at Parkland for personal benefit.

**Put Parkland responsibilities first.** Never allow an outside job to interfere with your duties at Parkland. Talk to your supervisor, manager or other appropriate member of leadership before accepting outside employment.

**Ask before serving.** Before joining the board of directors for another organization or participating on a government committee or commission, contact the [Compliance and Ethics Department](#) for guidance.

### Tell Me More



For more information, visit:

[Conflicts of Interest Policy](#)

[Employee Service on External Boards, Commissions, or Committees Policy](#)

[Solicitation Policy](#)



### What's the Diagnosis?

*Q – I'd like to accept a part-time job on the weekends. It has nothing to do with my work at Parkland, and it would only be for a few months. Is that a conflict?*

*A – Probably not. It depends on factors like the type of job you have and the hours you'll be required to work. Talk to your supervisor, manager or other appropriate member of leadership before accepting to make sure there is no conflict.*

*Q – I am a nurse. My family owns a business that provides home health services. Is it okay if I tell a Parkland patient about these services?*

*A – No. Promoting a family business to Parkland patients is not permitted.*

## Maintaining Proper Relationships

### We Believe

We best serve Parkland's interests when our decisions are free of influence from outside relationships or financial interests.

### What Should I Know?

Unless specifically permitted by policy, we do not offer or accept gifts, entertainment, or anything of value to or from:

- Patients or Prospective Patients
- Physicians or other Referral Sources
- Vendors or Community Partners

### Tell Me More

For more information, visit:

[Vendor Gifts, Gratuities and Business Courtesies Policy](#)



### What Should I Do?

**Know when to decline a gift.** Refusing a gift can be hard, especially if you might offend someone. But if the gift is inappropriate, politely decline to accept the gift.

**Honor your recipient's policies.** If you are offering a gift or hospitality, be sure to follow both our policies and the recipient's policies to avoid putting our relationship at risk.

**Maintain ethical relationships.** You may occasionally accept nominal promotional items from Vendors or Community Partners in accordance with policy and if acceptance does not constitute an endorsement or unduly influence business decisions.

**Understand proper entertainment.** You may accept or offer entertainment or meals as long as the giver is present, the gift isn't excessive, it's infrequent and it's related to Parkland business.

**Never accept cash.** Accepting cash or cash-equivalents, such as gift cards, from patients or vendors is never permitted.

**Ask for guidance.** If you are unsure whether a gift or offer of entertainment is appropriate, talk to your supervisor or other appropriate member of leadership or contact the [Compliance and Ethics Department](#).

*Q – A vendor has offered to pay for me to travel to a customer showcase to evaluate one of their new products. May I accept?*

*A – No. Accepting travel or payment to evaluate a product is not permitted. It's only acceptable if the travel is part of an executed contract with the vendor.*

## I received...



A gift card valued at \$20.



An invitation to dinner with an established vendor.



A tin of popcorn during the holidays.



Tickets to a local sporting event.



A coffee cup with the vendor's logo on it.



Free samples of a vendor's product.

## May I accept?

**No.** You may not accept cash or cash equivalents, like gift cards or gift certificates.

**Yes.** You may accept an occasional meal if it is of modest value, the vendor is present and business is discussed.

**Yes.** As long as such gifts occur infrequently and are shared with others in your department.

**It Depends.** A gift like this will likely exceed nominal value but there are circumstances when it may be permissible. Contact the Compliance and Ethics Department for guidance.

**Yes.** You may accept occasional promotional items of nominal value like a coffee cup, notepad or pen.

**No.** You may not accept any free samples, supplies or equipment for personal use.



## What's the Diagnosis?

# Responding to Government Investigations

## We Believe

Any interactions with the government must be based on honesty and cooperation.

## Our Commitment

We understand the unique laws and requirements that apply to our organization and are committed to upholding them.

## What Should I Know?

Government representatives may make announced and unannounced visits to any Parkland location.

Always treat visiting government representatives with courtesy and respect. Government audits and investigations related to Parkland matters help us demonstrate that we follow policies and regulations.

### In the event of an audit or investigation:

- Immediately notify the [Compliance and Ethics Department](#) and the [Legal Affairs Department](#).
- Never mislead a government official, auditor or investigator.
- Cooperate fully; never prevent the collection of information.

## What Should I Do?

**Let someone know.** Ask the government representative to wait in a location where business is not being conducted. Immediately notify the senior manager on duty and [Legal Affairs](#). Have a Parkland employee wait with the government representative while these internal notifications are being made.

**Avoid improper interaction.** Avoid offering anything of value to the government official and do not request favorable treatment.

**Don't alter records.** Do not alter or prematurely destroy any record in response to or anticipation of a request for the record by a government agency or court.

**Ask for help.** Understand that special rules apply when dealing with government officials. Contact the [Legal Affairs Department](#) or [Compliance and Ethics Department](#) if you have a question.

## Tell Me More

For more information, visit:

[Search Warrants Policy](#)

[Subpoena Policy](#)

[Unannounced Visits by Government Representatives Policy](#)



# Compassion & Collaboration

Serving our patients is not just a job – it's a calling in which we invest our hearts and minds.

## In this section:

- Sustaining Quality of Care and Patient Safety
- Protecting Patient Rights
- Safeguarding Protected Health Information

*"I lead considering the needs of others first."*





## Sustaining Quality of Care and Patient Safety

### We Believe

Every patient deserves compassionate and safe care that meets professionally recognized standards.

### Our Commitment

We strive to deliver the right care – to the right patient – at the right time – every time.

### What Should I Know?

Every person is expected to take initiative and join with others to:

- Promote evidence-based practices
- Improve safety and reduce the potential for harm
- Listen actively to patients
- Encourage learning
- Recognize and respect the voice of others to foster innovation



*We work to identify the potential for care-related harm and proactively seek to eliminate it.*

### What Should I Do?

**Practice responsibly.** Only provide clinical services that are indicated and within the scope of your education, skill and clinical privileges.

**Create value.** Follow established quality improvement protocols to improve the level of care and quality of patient services.

**Step up.** Participate in performance improvement and patient safety activities aimed at improving quality of care and patient outcomes.

**Speak up.** If you have a patient safety concern, speak up.

- Clearly state your concern.
- Ask for clarification or assistance.
- If needed, ask for a time-out to discuss further.
- Contribute to resolving the problem.
- Call your supervisor or the nurse administrator on call (in-house 24/7).

**Be accountable.** When problems come up with patient care, we hold ourselves and each other accountable. We find out the cause and improve our methods for the delivery of care.

**Follow up.** Promptly report any incident that may compromise patient care or safety.

**Foster patient reporting.** Encourage patients and their families to report their observations and complaints of unsafe conditions to a supervisor or a Patient Relations Advocate.

### Tell Me More



For more information, visit:

[Medical Staff Bylaws](#)

[Medical Staff Rules and Regulations](#)

[Nursing Peer Review Procedure](#)

[Nursing Practice Act in the State of Texas](#)

[Safety Center Reporting Procedure](#)

[Quality Assessment and Performance Improvement Plan](#)



### What's the Diagnosis?

*Q – Is it acceptable for a nurse to perform a procedure normally performed by a doctor if a doctor has requested it?*

*A – No. A doctor or advanced practice professional may not delegate a task that falls within his or her scope of practice to someone who isn't appropriately licensed and credentialed to perform it.*

# Protecting Patient Rights

## We Believe

When we listen to our patients, protect their rights and preserve their dignity, we honor the trust they have placed in us.

## Our Commitment

Parkland will provide appropriate and impartial access to care. At all times, the patient shall be treated with dignity and respect.

## What Should I Know?

We apply our admission, treatment, transfer, and discharge policies to all patients based upon their needs and our mission.

We serve all patients without considering race, color, age, religion, national origin, sex (gender, gender identity, sex stereotyping, pregnancy, childbirth and related medical conditions), gender expression, sexual orientation or disability.

All patients and their representatives must be given appropriate confidentiality, privacy, advocacy, safety, an avenue to lodge complaints, and an opportunity for resolution of complaints and pastoral or spiritual care.

## What Should I Do?

**Support Patient Rights.** Acknowledge and follow the Patient Rights and Responsibilities Procedure.

**Communicate clearly.** Share information with patients in a manner and language that the patient can understand. Allow for questions and clarification.

**Encourage involvement.** Create an environment of care where patients can speak openly with their providers, are informed about treatment options and are encouraged to be involved in their own care.

**Listen to patients.** Listen to and respect patient decisions regarding care, consent for treatment, managing pain or changing or withdrawing treatment.

**Answer questions.** Provide compassionate, accurate and timely responses to patients' questions.

**Act to protect.** Promptly report to your supervisor, manager or other appropriate member of leadership any alleged, perceived or real abuse, neglect, harassment, intimidation or exploitation of a patient.



*Serving with compassion, we help patients to exercise their rights and understand their responsibilities.*

## Tell Me More



For more information, visit:

[Language Assistance for Limited English Proficient Patients Procedure](#)

[Legally Authorized Representatives and Personal Representatives Procedure](#)

[Patient's Rights and Responsibilities Procedure](#)



## What's the Diagnosis?

*Q – A patient is not a proficient English speaker, but her minor-aged daughter seems to be very involved in helping her mother understand the conversations going on around them. Is it alright to let the young daughter translate when explaining the diagnosis to the parent?*

*A – No. You should never use family members or friends to provide language interpretation services to patients. This may result in the patient receiving incorrect or inaccurate information or create an inappropriate disclosure of protected health information. Also, Parkland policy prohibits using a minor child to provide interpretation services.*



# Safeguarding Protected Health Information

## We Believe

Our patients trust us with their personal information, and we must honor their right to privacy.

## Our Commitment

We safeguard our patients' Protected Health Information (PHI) to prevent it from being misused or inappropriately disclosed. We do not use or share PHI unless it's necessary to do our jobs or we are required by law.

We follow all applicable laws and regulations that protect our patients' PHI.

## What Should I Know?

The Health Insurance Portability and Accountability Act (HIPAA) tells us how to appropriately use PHI and share it with others.

PHI refers to information used to identify patients and deliver care, like:

- Demographic information (address, phone, age, race, gender and marital status)
- Medical history
- Test and laboratory results
- Medications
- Insurance information

## What Should I Do?

**Respect the patient's privacy.** Do not access, use or discuss PHI, unless it's needed in the course of treatment of patients, payments, or healthcare operations.

**Limit the use of PHI.** Collect and use only the PHI that you need to accomplish a task. Base your use on your role in the patient's care and the need to know.

**Follow our procedures.** Know and follow all of the administrative and technical procedures we have in place to prevent unauthorized access to, use of or disclosure of PHI.

**Get authorization.** Get proper authorization from the patient before you disclose PHI. Do not share, transmit, or otherwise use PHI for any purpose other than treatment, payment or healthcare operations.



## Tell Me More



For more information, visit:

[Accessing Protected Health Information Procedure](#)

[Notices of Privacy Practices Procedure](#)

[Permissible Uses of Protected Health Information Procedure](#)

[Confidentiality and Release of Health Care Information Policy](#)

[Reporting Privacy Incidents Procedure](#)

[Safeguarding Protected Health Information Procedure](#)

[Information Security Management Standards](#)



**We properly access, use and disclose our patients' Protected Health Information.**



## What's the Diagnosis?

*Q – A friend has asked me to access an electronic medical record to review the results of a recent laboratory test. Since this is my friend making this request, am I authorized to provide this information?*

*A – No. Don't ever access this information unless you are a member of the care team and provide this information in the normal course of providing care to the patient.*

*Q – A caller from the local newspaper is asking for status or other information about a patient. May I respond?*

*A – No. If you receive any request from the media regarding the condition of a patient, do not confirm or otherwise provide any information. Instead, redirect the request to [Corporate Communications](#).*

*Q – If I am coming right back, do I have to log-out (or tap-out) of my workstation?*

*A – Yes. Don't leave a workstation with your sign-on credentials still active. Everyone must log off/tap out before leaving a workstation.*

# Accountability

We are all responsible for what we do and say.

## In this section:

- Appropriately Using Parkland Assets
- Protecting Confidential Information
- Keeping Accurate Business Records
- Complying with Billing and Coding Requirements
- Representing Parkland
- Conducting Responsible Research
- Protecting Research Participants
- Email, Internet, and Information Systems
- Social Media

*"I listen to understand and  
treat everyone fairly."*



# Appropriately Using Parkland Assets

## We Believe

The public has entrusted us to protect, maintain and use Parkland’s assets for the purpose of carrying out our mission.

## Our Commitment

We preserve our organization’s assets and ensure their appropriate use and safeguarding.

## What Should I Know?

You have a responsibility to appropriately manage, maintain and/or use Parkland assets as we conduct our operations. These may be owned, leased, or borrowed assets and include such things as:

### Tangible Assets

- Land
- Buildings
- Equipment
- Medical supplies and drugs
- Information technology and hardware
- Other supplies

### Intangible Assets

- The Parkland name & logo
- Copyrighted information
- Confidential information
- Communications including e-mail
- Intellectual property
- Licensing agreements

## Email, Internet, and Information Systems

Parkland provides you with information systems tools for authorized business purposes. Use of Parkland’s information systems are governed by our information security policies and procedures. Be sure not to share passwords; do not leave work-stations and laptops unattended, and do not click on web links that you are not familiar with.

## What Should I Do?

### Use property and equipment properly.

Use all property and equipment for intended purposes and follow procedures for proper use. Keep equipment maintained and speak up when it’s damaged or not working properly. Do not use it for your own benefit – even if Parkland is disposing of it.

**Practice good safety and security.** Follow safety and security procedures. Keep secure areas locked and supplies secure. Speak up about any theft, loss or misuse of property or equipment.

**Protect intellectual property.** Keep confidential assets secure to prevent disclosure. Do not share research or other intellectual property without proper authorization.

**Follow IT policies.** Follow our computer and network security procedures to prevent unauthorized access. That includes not installing unauthorized software onto Parkland devices, copying software or sharing your ID or user password.



*We protect, maintain and use assets for the purpose of carrying out the Parkland mission.*

## Tell Me More



For more information, visit:

[Device and Media Controls Procedure](#)

[Workstation Appropriate Use and Security Policy](#)

[Information Security Management Standards](#)



## What’s the Diagnosis?

*Q – My department has several old computers that are about to be replaced with a newer model. I don’t think anyone will use these old computers. Is it okay for me to take one home for my child to use for his school work?*

*A – No. It is never okay to take an old workstation for personal use. To safeguard Parkland’s data assets, any information that is stored on the device must be removed before the device is reallocated or destroyed. Call the Information Technology (IT) Service Desk to request removal, reallocation or disposal of old workstations.*

*Q – May I send Parkland related items to my personal e-mail address so I have a copy?*

*A – No. The unauthorized sending, storing, copying, and transmitting of any Parkland information, including via personal e-mail, is prohibited.*



# Protecting Confidential Information

## We Believe

Confidential information is critical to our business and our reputation, so it must be protected from loss, misuse or inappropriate disclosure.

## Our Commitment

We maintain and protect the confidentiality of proprietary and/or private information regarding our patients, employees and operations.

## What Should I Know?

If in the course of doing your work for Parkland, you receive access to confidential information related to Parkland operations you must use it appropriately and protect it.

Confidential means any information that is proprietary, not publicly known, or is restricted for us to broadly communicate or share.

The unauthorized sending, storing, copying, transmitting any Parkland information or PHI via email to an external entity, personal email account, social media, USB, CD/DVD, mobile device, smart phone (including taking pictures) is prohibited always.

Parkland prohibits the use of confidential information for personal benefit.

### Examples of confidential Parkland information includes, but is not limited to:

- Financial, legal or business records
- Personnel information
- Patient lists or clinical information
- Patient information
- Vendor pricing or contract terms
- Research data
- Proprietary computer software
- Communications including e-mails

## What Should I Do?

**Respect personal privacy.** If your work involves collecting, handling or storing personal information of our staff, patients or partners, do so carefully, following data privacy laws.

**Refer requests.** If you receive a request for information that's confidential, ensure that it is appropriate to share the information. If unsure, seek appropriate approval before disclosing it.

**Do not disclose.** Be careful not to discuss confidential information in casual conversations, on social media or in public places.

**Know when to share.** Only share confidential or sensitive information with those who have a legitimate and lawful need to know.

**Report disclosure.** If you believe that confidential information has already been exposed, lost or stolen, immediately report it to your supervisor, manager or other appropriate member of leadership.

**Follow information security policies.** Secure confidential records, both paper and electronic. Protect electronic information by never sharing passwords or posting it publicly.



*We protect confidential information about our patients, our employees, our business and our partners.*

## Tell Me More



For more information, visit:

[Release Employee Information Procedure](#)

[Confidentiality and Release of Health Care Information Policy](#)

[Information Security Management Plan](#)



## What's the Diagnosis?

*Q – A Facebook friend was recently flown by air ambulance from an accident scene. Everyone is trying to find out which hospital she was taken to. They want to know if she was admitted to Parkland. Is this okay?*

*A – No. You may not use your access to the patient's medical record to comment on (confirm or deny) whether the patient has been brought to Parkland.*

*Q – Can I use my computer access to view my own health information?*

*A – No. You may not use your job-related access to view your medical information. Like all patients, we can access our records by using MyChart™ or by contacting Health Information Management.*



## Keeping Accurate Business Records

### We Believe

Maintaining accurate records helps us to safely care for our patients and is vital for good business operations.

### Our Commitment

We ensure patient, business and financial records are accurately documented, whether in electronic or paper form.

### What Should I Know?

Relying on accurate records, we are able to:

- Comply with legal and regulatory reporting obligations
- Manage our business
- Meet obligations to our patients and the community

### What Should I Do?

**Focus on accuracy.** Never falsify or alter any record. That includes never making false entries or changing transactions to cover up something improper. Our records include such things as:

- Medical records
- Financial statements
- Billing claims
- Invoices/purchase orders
- Expense reports
- Payroll records
- Benefit claims

**Watch for possible fraud.** Stay alert for possible false entries, misleading statements or anything missing from our records. [Speak up](#) right away about any concerns you might have.

**Retain records.** The law requires us to retain certain records for certain periods of time – especially records related to employees, health and safety, taxes and more. Understand and follow our Retention Policy and Schedule.



It's in Our DNA

We seek accuracy and accountability through good records management practices.



### Tell Me More



For more information, visit:

[Destruction of Scanned Documents Procedure](#)

[Policy on Records & Information Management](#)

[Record Retention Review](#)

[Records Retention Schedule](#)



### What's the Diagnosis?

**Q** – In an effort to clean up our work area, we are trashing paper documents from the filing cabinets. Is it okay to put official business documents or medical records in the shred bin?

**A** – Stop. Before removing official documents or medical records, contact the Records Information and Management Department for assistance to determine proper retention and destruction requirements.

**Q** – I have noticed a pattern with expense reports from an employee. The same item and amount keeps appearing. Should I say something or wait and see if it happens again?

**A** – Say something. Do not wait, and do not ignore your concerns. There may be nothing wrong, or you may be helping to uncover something improper.

# Complying with Billing and Coding Requirements

## We Believe

Accurate documentation, coding and billing is key to quality healthcare delivery and appropriate reimbursement.

## Our Commitment

We are committed to timely and accurate documentation, coding and billing that reflect the services ordered and actually performed.

## What Should I Know?

Medical records are relied on to provide care, treatment and services to patients, and to submit proper claims for reimbursement.

When our documentation is accurate, it allows us to:

- Charge for services we order and perform
- Assign appropriate codes to the encounter
- Submit the correct claims
- Comply with federal and state laws and regulations
- Support our business practices and actions

The False Claims Act prohibits us from knowingly making false claims for payment to the government.

## Tell Me More



For more information, visit:

[Deficit Reduction Act \(False Claims Act\)](#)

[Waiver of Medicare Co-Payments and Deductibles Policy](#)

[Reporting and Refunding Overpayments](#)

## What Should I Do?

**Create accurate records.** Document accurately and timely. Provide complete documentation of patient call and treatment.

**Follow coding procedures.** Assign ICD-10-CM/PCS and CPT codes that accurately reflect the services of the provider based on documentation in the medical record. Stay up to date on any changes in practices or policies.

**Generate accurate bills.** Only bill for services we actually provide, which are documented in our patients' medical records. Co-payments or deductibles must be waived in accordance with applicable laws and regulations and Parkland policy.

**Respond to inquiries.** Comply with laws and regulations that cover billing and address any inquiries quickly and honestly. Respond promptly to any patient complaints or questions regarding a bill.

**Carefully review payments.** If you identify any overpayments, promptly report it to the Compliance and Ethics Department because keeping an overpayment could result in a false claim.



*We will strive to properly document, code, and bill for services. This helps us provide quality patient care and receive accurate reimbursement.*



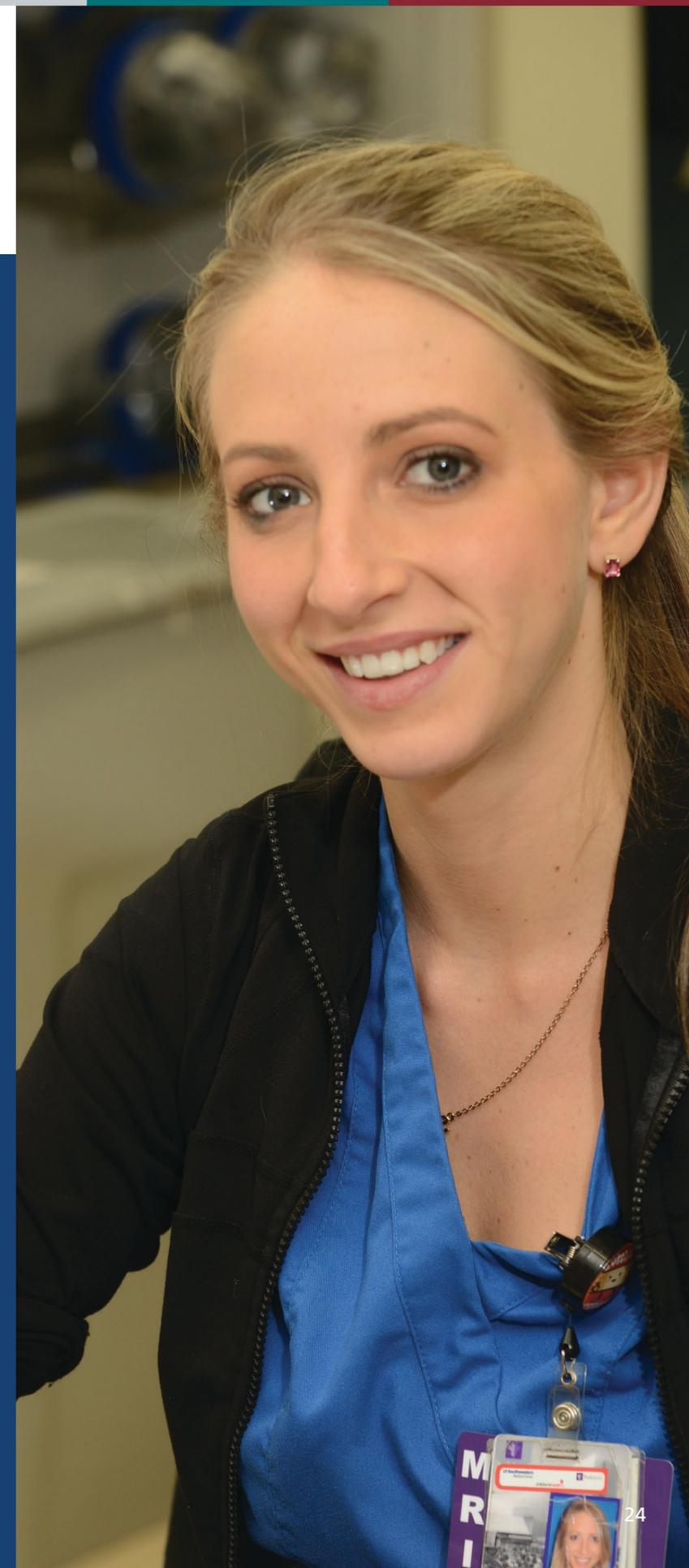
## What's the Diagnosis?

**Q** – A co-worker received a call from a patient stating that his claim will not be paid based on the ICD-10 codes on the claim. The patient asked the coder to change the code to a more specific code that would be paid by the insurance company. The co-worker agreed to change the code. Should I say something about this?

**A** – Yes. Let your co-worker know that these types of requests should be routed to Patient Financial Services Leadership for review. No one should ever change a code based on what insurance will pay if the documentation in the medical record does not support that code.

**Q** – A co-worker, who has responsibility to review and resolve billing edits, has mentioned that she applies certain modifiers because she knows that if she doesn't, the hospital won't get paid. Should I let someone know?

**A** – Yes. Contact the Compliance and Ethics Department to report this situation. If medical documentation did not support the addition of the modifier, Parkland may need to repay payments previously received.





## Representing Parkland

### We Believe

The Parkland name is highly regarded. Each of us has a duty to protect our reputation.

### Our Commitment

What we say to the public regarding Parkland matters a great deal to our patients, employees and other constituents. We make sure any statements made about Parkland are accurate, reliable and appropriate.

### What Should I Know?

Only authorized individuals are allowed to speak or otherwise communicate on Parkland's behalf. Unless approved in advance by [Corporate Communications](#):

- Do not serve, in your Parkland capacity, on an External Board, Commission or Committee.
- Do not make any public comment about Parkland finances, appropriations or operations.
- Do not lobby on behalf of Parkland or conduct any advocacy activities.

If you're not authorized to speak for Parkland, our communications could have negative results like:

- Misinforming patients, business partners or the public
- Making promises Parkland can't keep or that you're not authorized to make
- Disclosing confidential information inappropriately
- Damaging our reputation

### What Should I Do?

**Use social media responsibly.** When you communicate on social media, be careful in what you say about Parkland. If you say you are associated with Parkland, make it clear that your views are yours – not Parkland's.

You should use your mobile devices in accordance with Parkland's Social Media Policy. Do not use your personal device to take pictures of patients or patient information. Never post patient information or photographs.

**Protect confidential information.** Do not share confidential information about Parkland, our patients or our business partners on social media or through any other unauthorized communication.

**Refer any requests.** Unless you are authorized to speak for Parkland, refer any request from the media or other sources outside of Parkland to [Corporate Communications](#).



*You do not represent Parkland, in any public forum, unless authorized to do so.*

### Tell Me More



For more information, visit:

[Corporate Communications Procedure](#)

[Employee Conduct and Gifts to Elected Officials Policy](#)

[Employee Service on External Boards, Commissions, or Committees Policy](#)

[Social Media Procedure](#)



### What's the Diagnosis?

*Q – What if I have already posted information about Parkland on social media. Is it too late?*

*A – No. You may be requested to take down the post or take additional action. Contact the Office of Talent Management or the Compliance and Ethics Department for guidance.*

# Conducting Responsible Research

## We Believe

Research is an important part of healthcare delivery and is at the heart of all medical advances.

## Our Commitment

We undertake scientifically meritorious research that upholds the ethical principles of human subject research.

## What Should I Know?

Any research conducted at Parkland must be approved in advance by the Parkland Office of Research Administration.

Participant enrollment in a research study (or clinical trial) must be voluntary.

We will not tolerate research misconduct. Research misconduct is defined as follows:

- **Fabrication** – making up data or results and recording or reporting the fabricated information.
- **Falsification** – manipulating research materials, equipment or processes, or changing or omitting data or results to misrepresent the research.
- **Plagiarism** – using another person’s ideas, processes, results or words without giving appropriate credit.

## What Should I Do?

**Uphold policies.** Review and follow all policies regarding the proposal, approval, conduct and reporting of research.

**Avoid conflicts.** Do not get involved in any relationship or activity that could influence or appear to influence your ability to protect research participants or compromise the validity of research results.

**Bill correctly.** Avoid and detect any research-related billing errors by helping the Parkland Office of Research Administration to carefully determine the right coding and billing assignment when research participants are involved.

**Use funds responsibly.** Honor the terms of research funding that we receive. Make sure those funds are used carefully – that any use is necessary, reasonable, authorized and well documented.

**Manage inquiries and complaints.** Promptly direct any research-related questions (that the research team can’t answer) or participant complaints to the Parkland Office of Research Administration.

**Report misconduct.** Promptly notify the [Parkland Office of Research Administration](#) of any research misconduct.



*We conduct clinical research, acting responsibly and with scientific integrity.*



## Tell Me More

For more information, visit:

[Clinical Trials](#)

[Research at Parkland](#)

[Research Misconduct Policy](#)



## What's the Diagnosis?

*Q – I realized that I made a mistake in recording data for one research subject, but the data was not final. Is that considered misconduct?*

*A – No. Making a mistake is not intentional misconduct. It would be intentional misconduct if you knowingly included the data in the final results. If you become aware of a mistake, correct that subject’s data appropriately and notify the study principal investigator.*

*Q – While participating in a research study, a Parkland patient undergoes a special biopsy. How should the charge for the biopsy be handled?*

*A – The biopsy may be a research-driven procedure (billable to the research study), or a standard of care procedure (billable to the payor), or a research procedure (billable to the research study). Each study is different, and it is sometimes hard to determine how the charges should be assigned. To find out, contact the [Parkland Office of Research Administration](#).*

# Protecting Research Participants

## We Believe

It is our responsibility to protect research participants. We do so through well-designed, appropriately approved protocols, offering information and obtaining informed consent from each participant.

## Our Commitment

We do not put the goals of any study before the protection of the research participants.

## What Should I Know?

Protecting the rights of research participants is everyone's responsibility.

## What Should I Do?

Follow these principles for conducting research:

- **Respect for persons** – Recognizing the patient's rights, take steps to fully inform the patient about study risks and benefits, and honor the patient's choice to enroll or decline participation.
- **Beneficence** – Seeking to do the most good, strive to minimize research-related risks and maximize potential benefits.
- **Justice** – Balancing the distribution of risks and benefits across all sectors of potential participants, select participants fairly.

## Obtain Informed Consent (Written).

When individuals give consent to participate in a study, it means they understand:

- The purpose of the research
- Their rights and responsibilities
- What is expected and how long it will last
- What risks are involved
- How confidential it will be
- What happens after the study is complete
- What the alternatives are if they choose not to take part in the study
- Where to go for questions

**Protect vulnerable participants.** Be aware of the need for added protection for any participant who might be vulnerable (for example due to health status, education, comprehension or socioeconomic factors), and respond to any concerns immediately.

**Safeguard Protected Health Information.** Keep in mind that the HIPAA Privacy Rule also applies to research participants. Do not share the Protected Health Information (PHI) of research participants without proper written authorization.

## Tell Me More



For more information, visit:

[Patient's Rights and Responsibilities Procedure](#)

[Research Participants Protection Plan](#)

[The Belmont Report](#)



*We provide appropriate information so potential research volunteers can consent to participate or decline involvement altogether. No matter the choice, we honor their decision.*



## What's the Diagnosis?

**Q** – If I am aware of a patient who might be a good candidate for a certain research study, may I discuss it with the patient and share his contact information with the researcher?

**A** – Yes. As long as you obtain proper authorization from the patient and all HIPAA rules have been met.

**Q** – A patient is considering taking part in a research study. He went home to discuss the study with his family and came back with lots of questions. Who can he contact?

**A** – For questions about the purpose of the research, the study activities and any investigational drugs or procedures, the study doctor (also called the principal investigator) or study coordinator is typically the first choice.

He may also contact the [Parkland Office of Research Administration](#) for information about studies conducted at Parkland.

# Respect

We value every member of the Parkland team.  
We respect and support each other, appreciating  
each person's unique contributions.

## In this section:

- Maintaining a Safe Environment
- Fostering a Positive Workplace
- Serving in our Communities

*"I accept accountability for my  
actions and conduct myself in  
a manner that builds trust."*



# Maintaining a Safe Environment

## We Believe

A positive workplace promotes a culture of safety – where every member of the Parkland team has a safe, healthy and secure work environment.

## Our Commitment

We protect each other and everyone who visits our facilities by carefully following all safety procedures and guidelines.

## What Should I Know?

Safety is everyone’s responsibility. It requires our constant care and attention. Alert appropriate departments and personnel if you see or know of unsafe conditions or practices.

We watch for and report safety hazards to the appropriate department. These may include:

- Blood borne pathogens and other medical waste
- Hazardous chemicals
- Slip and fall hazards
- Damaged or unmaintained equipment
- Electrical hazards
- Unauthorized weapons on premises

## What Should I Do?

### Know and follow safety requirements.

Learn and carefully follow the safety requirements that apply to your job and the equipment you use. Use Personal Protective Equipment (PPE) whenever it’s required.

**Get the right training.** Be properly trained for any equipment you use or procedures you perform.

**Prevent workplace violence.** Immediately report any physical assault, threat, intimidation or property damage, and keep in mind that unauthorized weapons are prohibited from all of our facilities.

**Prevent substance abuse.** Report the presence or use of illegal drugs. Know that all controlled substances are securely stored and counted. Immediately report any missing or diverted drugs. Never report to work while under the influence of drugs or alcohol.

**Secure our facilities.** Always wear your ID badge, and observe Parkland’s procedures for preventing unauthorized access to sensitive areas. If you see anyone or anything that requires emergency attention, call 911 (off and on-campus).

**Report injuries.** If you become injured or ill as a result of your job, follow reporting procedures and promptly let your supervisor, manager or other appropriate member of leadership know.

## Workplace Violence

### SYS.HR.009 Workplace Violence

Parkland has a zero tolerance for workplace violence. Aggressive behavior in the workplace includes physical injury, abusive language, harassment, intimidation disruptive behavior and threats. You should not act in any way that could cause another individual to feel threatened or unsafe.



## What’s the Diagnosis?

*Q – I noticed improper disposal of some medical waste. Since it’s a very busy time at work, is it okay to wait until later to mention it to someone?*

*A – No. Safety is our top priority, and a hazard like this can’t be ignored. You should take a moment to report the potential hazard.*



## It’s in Our DNA

*Safety is everyone’s responsibility. It requires our constant care and attention.*

## Tell Me More

For more information, visit:

[Drug Free Workplace Procedure](#)

[Probable Cause Drug Testing](#)

[Safety Management Plan](#)

[Unresolved Drug Discrepancy Policy](#)



# Fostering a Positive Workplace

## We Believe

Our desire to care for others unites us. By standing together and respecting one another, we create a workplace that generates wonderful results for our patients.

## Our Commitment

We make our workplace welcoming for everyone by treating each other with courtesy, dignity and respect. We strive to keep any act of unacceptable or disruptive behavior out of the workplace.

## What Should I Know?

Parkland seeks to create a work environment that is free from harassment of any kind and offensive or disrespectful conduct. Some examples of harassment include:

- Sexual harassment
- Offensive language or jokes
- Racial, ethnic, gender, or religious slurs
- Degrading comments
- Intimidating or threatening behavior
- Unwanted physical activities (e.g., touching, hugging, or blocking someone's path)
- Showing hostility toward others

You should never act in a harassing manner or otherwise cause anyone to feel uncomfortable in their work environment.

## What Should I Do?

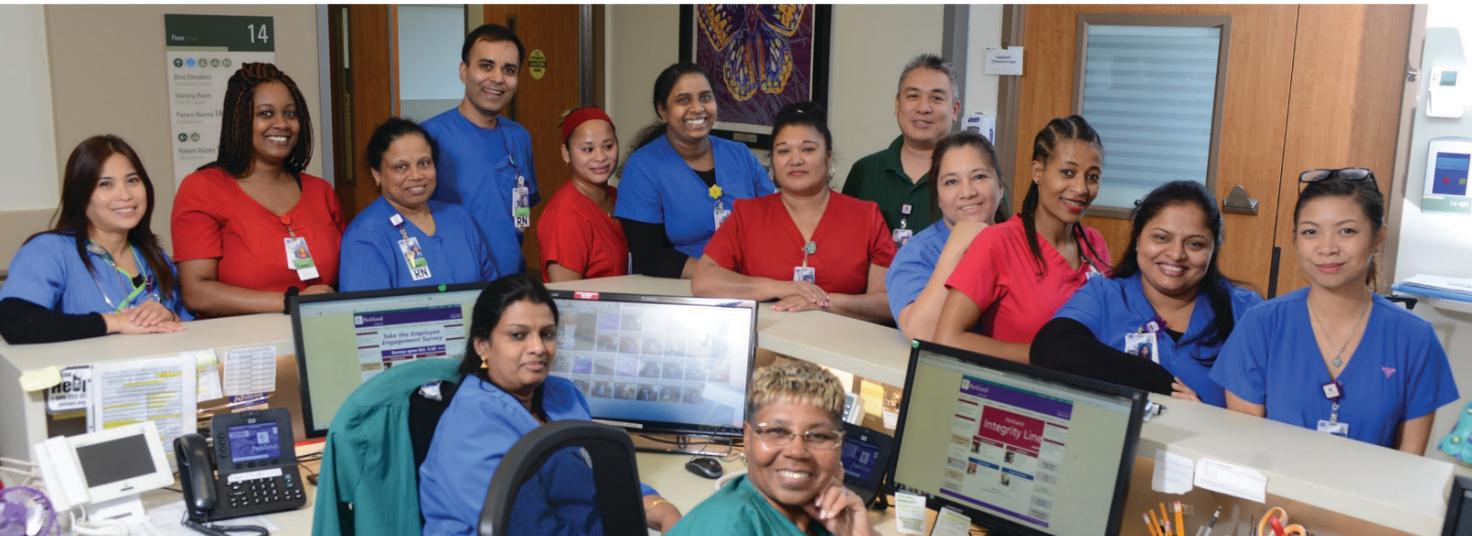
**Treat co-workers with respect.** Use care in your interactions with others. Keep your interactions positive, professional and respectful at all times.

**Prevent discrimination.** Never limit employment opportunities or engage in workplace behavior based on discrimination.

**Make reasonable accommodations.** Provide reasonable accommodations for disabilities and sincerely held religious beliefs, as required by law.

**Do not solicit.** Do not request donations, sell or take orders for anything while on Parkland premises, unless specifically authorized by Parkland to do so.

**Speak up.** If you have experienced or you know of intimidating or disruptive behavior in the workplace, promptly let your supervisor, manager or other appropriate member of leadership know and/or report the incident to your Talent Management Business Partner.



## What's the Diagnosis?

**Q** – I witnessed a staff member intimidating a colleague. Since the colleague hasn't complained about it himself, should I ignore it?

**A** – No. Even if a person doesn't complain about intimidation or harassment, it's still unacceptable at Parkland. We want to know about it, so speak up about it right away. Do not ignore it.

**Q** – I have paged a doctor regarding a patient, and not been responded to. What should I do?

**A** – If a physician does not timely respond to a page regarding a patient, ask your supervisor, manager, or other appropriate member of leadership for assistance.

## It's in Our DNA

*We are positive, professional, and respectful in our interactions with others.*

## Tell Me More

For more information, visit:

[Colleague Behavior Expectations Procedure](#)

[Equal Employment Opportunity Procedure](#)

[Discrimination/Harassment/Retaliation Procedure](#)

[Non-Retaliation Policy](#)

[Solicitation Policy](#)



## Serving in Our Communities

### We Believe

When individuals commit themselves to a cause, they have the power to make a difference in their communities.

### Our Commitment

Individual participation in charitable or political causes is voluntary.

### What Should I Know?

Parkland is a taxpayer supported unit of local government. That means your charitable or political activities must be kept separate from your work at Parkland.

Your support to a charitable or political activity must be given without using Parkland's name or its resources.

### What Should I Do?

**Use your own time and resources.** Your charitable work or political activities should never interfere with your Parkland work schedule or responsibilities. Never use Parkland resources, such as computers, phones and printers to support your charitable or political activities.

**Speak on your own behalf.** If you decide to volunteer for a political or charitable cause, do not make any statements or take any action in the name of Parkland. Any comments you make must be stated as your own.



*We support your right to participate in charitable or political causes, but keep these interests separate from your Parkland responsibilities.*

### Tell Me More

For more information, visit:

[Employee Conduct and Gifts to Elected Officials Policy](#)



### What's the Diagnosis?

**Q** – *I am supporting a local political candidate who openly supports Parkland and the work we do. May I speak out at her campaign event and identify myself as a Parkland employee?*

**A** – *No. Parkland does not endorse or contribute to any political campaigns or causes, so it would be inappropriate for you to use your position as a Parkland employee to support her campaign.*



# Equity

Fairness, recognition, justice, honor, and opportunity are offered to everyone.

## In this section:

- Promoting Diversity and Inclusion
- Anti-Discrimination
- Substance Abuse

*"I seek to be honest, trustworthy, authentic, humble and transparent."*



## Promoting Diversity and Inclusion

### We Believe

By tapping into the full spectrum of different perspectives, skills, and experiences, we can solve difficult and complex problems.

### Our Commitment

We respect every team member without regard to individual differences.

### What Should I Know?

You have a responsibility to help create a work environment that is inclusive, allowing each person to perform at their fullest potential.

### What Should I Do?

**Take responsibility.** Recognize your own potential for bias and remedy it.

**Show respect.** Take time to learn about and appreciate others who are different from you. Reach across boundaries to work with others.

**Include everyone.** Help everyone on the team to feel included, involved and valued.

**Challenge discriminatory behaviors.** Discourage disrespectful jokes or language.



## It's in Our DNA

*We ask questions, listen, and consider the contributions of others.*

### Tell Me More

For more information, visit:

[Colleague Behavior Expectations Procedure](#)



## What's the Diagnosis?

*Q – What if a co-worker takes something that I say as offensive, even if I didn't mean it to be? It's not my problem if she's overly sensitive, is it?*

*A – Yes, it is your problem. Harassment is judged from the point of view of the person offended, not what you intended to say. That's why it's important to be aware of your own behavior and how your words and actions affect others.*



## Anti-Discrimination

Parkland fosters a work environment free of discrimination. Parkland prohibits treating anyone unfairly in matters that involve recruiting, hiring, training, promoting, compensation, or any other term or condition of employment. Employment decisions must always be in compliance with the law and based on merit, qualifications and job-related performance, and without regard to non-job-related characteristics such as:

- Race
- Color
- National origin
- Religion
- Sex (including pregnancy and childbirth)
- Sexual orientation
- Gender (including gender identity and gender expression)
- Age (40 or over)
- Disability
- Genetic information
- Marital status or political belief

## Substance Abuse

### 6000-400 Drug Free Workplace

Parkland prohibits the abuse or misuse of drugs, alcohol or any other illegal or controlled substances. Parkland expects that you will perform your job duties free from the influence of any substance that could affect your job performance.



# Our Commitment

Thank you for taking the time to read Parkland’s Code of Conduct and Ethics. Apply it to your daily work, refer to it often and let it guide the decisions you make. Remember, you represent Parkland to our community and our patients. They place their trust and their lives in your hands every day. We repay that trust with our continued compassion and dedication to excellence.

So keep the Code in mind and live its lessons every day. If you have any questions or feedback about anything in the Code or our policies, reach out to your supervisor, manager or another appropriate member of leadership. If you believe there are exceptional circumstances requiring an exemption or waiver of anything in the Code, contact the Compliance and Ethics Department.

As you return to work, in whatever job you hold, remember that we’re all connected. Working together with integrity, we strengthen our service to the community.



# Our Resources

Parkland has a variety of ways for you to seek support, guidance and report concerns:

<b>Compliance and Ethics Department</b>	<b>214-590-1171</b>
<b>Corporate Communications</b>	<b>469-419-0893</b>
<b>Integrity Line</b>	<b>800-351-0093</b>
<b>IT Service Desk</b>	<b>214-590-5999</b>
<b>Legal Affairs Department</b>	<b>214-590-4575</b>
<b>Media Relations</b>	<b>469-419-4400</b>
<b>Records Information and Management Department</b>	<b>214-590-4575</b>
<b>Regulatory Affairs</b>	<b>214-590-8968</b>
<b>Office of Research Administration</b>	<b>214-590-1170</b>
<b>Office of Talent Management</b>	<b>469-419-3000</b>
<b>Patient Relations Department</b>	<b>469-957-0820</b>
<b>Quality and Patient Safety Department</b>	<b>214-590-8968</b>
<b>Safety Center</b>	<a href="https://phhs.sharepoint.com/safetycenter">https://phhs.sharepoint.com/safetycenter</a>

We support the right of Parkland employees to speak out publicly on matters of public concern. Nothing in this Code or in any Parkland policy is intended to limit or interfere with any rights that our employees may have under the U.S. National Labor Relations Act or the U.S. Constitution.