Our Values in Practice.

We Serve.

Contents Resources
Compassion and Collaboration
Excellence and Leadership
Respect
Stewardship
Integrity

Code of Conduct and Ethics
Contents

Our Message to You 2

Our Inspiration 2

Our Code 3
  • Getting to Know the Code 4
  • Understanding Your Responsibilities 5
  • Making Good Decisions 5
  • Reporting Concerns 6
  • No Retaliation 7

Our Values in Practice 8

Compassion and Collaboration 9
  • Sustaining Quality of Care and Patient Safety 10
  • Protecting Patient Rights 11
  • Safeguarding Protected Health Information 12

Excellence and Leadership 13
  • Conducting Responsible Research 14
  • Protecting Research Participants 15

Respect 16
  • Maintaining a Safe Environment 17
  • Fostering a Positive Workplace 18
  • Promoting Diversity and Inclusion 19
  • Serving in Our Communities 20

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

Integrity 27
  • Complying with Laws and Regulations 28
  • Working with Physicians and Other Referral Sources 29
  • Avoiding Conflicts of Interest 30
  • Maintaining Proper Vendor Relationships 31
  • Responding to Government Investigations 32

Our Commitment 33

Our Resources 33

Throughout this document, any references to Parkland refer to Parkland Health & Hospital System 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 health care 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 health care, 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 quality care for the indigent and needy people residing in Dallas County. Compassionate care is at the heart of everything we do – it is our purpose for being.

As we continue to define the standards of excellence in public health care, 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 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 Parkland, the Code applies to you – it applies, without exception, to all Parkland board members, employees, medical staff members, residents, fellows, students, contractors, volunteers and others who conduct business for, or on behalf of Parkland.

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.

Managers and leaders have additional responsibilities:

- 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?

Making Good Decisions

Every day we make choices, serving thousands of patients. They depend on us to get their care right, and that puts real pressure on us. But you handle that pressure because you are talented and you care. Combine that with self-awareness and humility, and you recognize where we have opportunities to improve and to 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:

- Does the action align with our values?
- Is it legal?
- Does it follow our policies?
- Does it benefit Parkland and our patients?
- Would I be comfortable if my action was shared in the news or on social media?

If you answer “no” to any of these questions or the answer still isn’t clear, stop and take a step back. Before you take any action, get advice from your manager or ask questions. Remember, it is always best to ask before you act.
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.

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 Employee Relations Advisor. If your concern is a workplace related issue that cannot be resolved in your chain of command, call your Employee Relations Advisor.

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

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

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. Use your Report Key to check on the status of your report.

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

Tell Me More

For more information, visit:

Integrity Line Procedure

Reporting Obligations Policy

Safety Center Reporting

Workplace concerns include:

- Difficulties between you and a co-worker
- Failure to follow 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 Employee Relations Advisor, but is not resolved.

You or another Parkland employee/contractor has:

- Been the subject of retaliation for reporting a concern in good faith
- Inappropriately received something of value, such as supplies, equipment, gifts or gratuities from a service provider or supplier
- 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
- Been excluded by a sanctioning authority from performing services that are reimbursed by government providers (Medicare, Medicaid, etc.)
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. In “good faith” means you actually believe that the information reported is true.

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

Compassion and Collaboration

Excellence and Leadership

Respect

Stewardship

Integrity

Contents Resources
Compassion and 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 serve with empathy and work alongside others to achieve results.”
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

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.

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
- Quality Assessment and Performance Improvement Program

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, 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.

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 Do?

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

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 health care 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 health care operations.

Tell Me More

For more information, visit:
- Accessing Protected Health Information
- Notices of Privacy Practices
- Permissible Uses of Protected Health Information
- Release of Health Care Information
- Reporting Privacy Incidents
- Safeguarding Protected Health Information
- Workstation Appropriate Use and Security Policy

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.
Excellence and Leadership

Seeking to identify better ways to deliver population-based care, we focus on improving health outcomes and reducing per capita costs.

In this section:

- Conducting Responsible Research
- Protecting Research Participants

“I lead considering the needs of others first.”
Conducting Responsible Research

We Believe
Research is an important part of health care 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 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.

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.

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 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 right, 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

What’s the Diagnosis?

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 be 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.
In this section:

- Maintaining a Safe Environment
- Fostering a Positive Workplace
- Promoting Diversity and Inclusion
- Serving in Our Communities

“*I listen to understand and treat everyone fairly.*”
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 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.

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.
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?

We do not discriminate based on qualities like 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.

Behavior that disrupts someone’s work or creates a hostile work environment is also prohibited.

We do not permit harassment, which is any unwelcome physical, verbal or visual conduct that creates an intimidating, offensive or hostile environment that interferes with work performance. Examples of prohibited behavior include making:

- Racial slurs
- Threats or intimidating remarks
- Ethnic jokes
- Sexual advances or suggestions
- Requests for sexual favors

What Should I Do?

Treat co-workers with respect. Use care in your interactions with others. Keep them 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 Employee Relations Advisor.

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.

Tell Me More

For more information, visit:
- Colleague Behavior Expectations
- Equal Employment Opportunity
- Harassment/Retaliation
- Non-Retaliation Policy

It’s in Our DNA

We are positive, professional, and respectful in our interactions with others.
Promoting Diversity and Inclusion

We Believe

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.

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.
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.

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.

Tell Me More

For more information, visit: Employee Conduct and Gifts to Elected Officials
Stewardship

Taking care of our resources today brings lasting benefits to our patients and community.

In this section:

• Appropriately Using Parkland Assets
• Protecting Confidential Information
• Keeping Accurate Business Records
• Complying with Billing and Coding Requirements
• Representing Parkland

“I accept accountability for my actions and conduct myself in a manner that builds trust.”
 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
- Other supplies
- Information technology and hardware

Intangible Assets
- The Parkland name & logo
- Copyrighted information
- Confidential information
- Intellectual property
- Licensing agreements

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.

Tell Me More
For more information, visit:
- Device and Media Controls Procedure
- Workstation Appropriate Use and Security Policy

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.
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.

Parkland prohibits the use of confidential information for personal benefit.

Some examples of confidential Parkland information include:

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

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.

Tell Me More

For more information, visit:

- Releasing Employee Information
- Release of Health Care Information

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.
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 electronic or paper.

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.

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 health care 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 Do?

Create accurate records. Document accurate, timely and complete patient information regarding their care and treatment.

Follow coding procedures. Assign ICD-10-CM/PCS and CPT codes that accurately reflect the services provided 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. Only waive co-payments or deductibles 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 and repay them. Keeping an overpayment could result in a false claim.

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.

We Believe
Accurate documentation, coding and billing is key to quality health care 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.

It’s in Our DNA
We will strive to properly document, code, and bill for services. This helps us provide quality patient care and receive accurate reimbursement.
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 allow authorized individuals 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 we’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.

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.

Q – What if I have already posted information about Parkland on social media. Is it too late?
A – No. Let your supervisor, manager or other appropriate member of leadership know about your posting. There may be no problem with the message you sent, but this allows us to make sure that no harm is done.
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 Vendor Relationships
• Responding to Government Investigations

“I seek to be honest, trustworthy, authentic, humble and transparent.”
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.

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, Parkland policies and procedures and the Corporate Integrity Agreement.

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.

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 health care 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 patient's 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

Be accountable. If you become excluded, debarred, or ineligible to participate in a Federal health care program, or are convicted of a criminal offense related to the provision of health care products or services, 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.

Tell Me More

For more information, visit:

Compliance with Privacy Requirements Policy
Deficit Reduction Act (False Claims) Policy
Sanction Screening Policy

It's in Our DNA

We seek to understand and follow all of the laws and regulations that apply to our work at Parkland.
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 anyone, including colleagues, physicians or any other provider to refer a patient.
- **Refuse payments for referrals.** If you are offered any kind of payment for a patient referral, turn it down. It doesn’t matter how many referrals the provider has given us – we can’t accept.
- **Engage referral sources appropriately.** Any engagement with a referral source must be in writing and reviewed and approved under applicable laws and regulations and Parkland policies and procedures.

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.

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

What Should I Do?
Make decisions considering only Parkland’s best interests.

- Remove yourself from any Parkland decision that could potentially affect your outside interests or those of family members, business partners or friends.
- Do not ask or 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.

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.
Maintaining Proper Vendor Relationships

We Believe
We best serve Parkland’s interests when our decisions are free of undue outside relationships or financial interests.

Our Commitment
We do not offer, accept or provide personal gifts or favors, such as tips, meals, transportation, entertainment or anything of value in exchange for an official act (or omission thereof) with regards to our Parkland obligations and responsibilities.

What Should I Know?
You should minimize the acceptance of vendor gifts because they could appear to affect your business judgment.

Follow the Vendor Gifts, Gratuities and Business Courtesies Policy, know when a vendor gift might be acceptable.

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 it’s 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 vendor relationships. You may occasionally accept nominal promotional items from vendors, but be careful not to endorse any vendor’s product or service.

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’re ever unsure whether a gift or offer of entertainment is appropriate, talk to your supervisor, manager, or other appropriate member of leadership or contact the Compliance and Ethics Department.

I received…

A gift card valued at $20.

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

An invitation to dinner with an established vendor.

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

A tin of popcorn during the holidays.

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

Tickets to a local sporting event where the vendor will not be present.

No. A gift like this is not only extravagant, but it is also inappropriate if the vendor is not present.

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

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

Free samples of a vendor’s product.

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

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.
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 senior manager and Regulatory Affairs.
• 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 Regulatory 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 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
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.