



The Standards We Live By



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This booklet is designed to assist employees, volunteers, physicians, contractors, and vendors understand the mission, values, and standards of conduct adopted by Huntington Health, an affiliate of Cedars-Sinai. It is a description of the values we live by and the standards we believe are necessary to accomplish our mission.

As employees, volunteers, physicians, contractors, and vendors begin work with Huntington Health, this booklet will serve as an introduction to our commitment to excellence. It provides information about key issues that everyone should be familiar with to meet our established standards. Resources are also provided for questions or concerns about activities that are not in harmony with our mission, core values, behavioral expectations, or standards of conduct.

For more information about our Standards of Conduct, please see Administrative Policy and Procedure #013 titled "Standards of Conduct".



Our Vision

To be the leader in creating community well-being through world-class care delivered with kindness and dignity.

Our Mission

To provide excellent health care and compassionate service to each person by bringing together outstanding physicians, caring nurses, professional staff, and advanced technologies.

Our Values

To support our vision and mission, and as an important guide for the work we do every day.



Collaboration

We work closely and productively with each other, with those we care for, and with the community.



Respect

We affirm the rights, dignity, individuality and worth of each person we serve, and of each other.



Integrity

We honor the commitments that we make, believe in fairness and honesty, and are guided by our ethics.



Stewardship

We wisely care for the human, physical and financial resources entrusted to us.



Excellence

We strive for excellence, quality and safety, and we are committed to providing the best care, work environment and service possible.

Our Essence

To provide compassionate community care.

Standards of Conduct

The standards of conduct address the following areas:

- Quality of care and services
- Compliance with laws and regulations
- Coding and billing integrity
- Conflicts of interest
- Human resources
- Safeguarding property, assets and information
- Maintaining a safe work environment
- Responsible conduct of research

Quality of Care and Services

We are committed to providing a caring and comfortable environment and each of us makes an integral contribution in creating this environment.

As our mission statement declares, Huntington Health is committed to providing excellent health care to our communities. This statement explains why our organization exists. All activities are directed at accomplishing this goal, including a commitment to ensure that all services provided to our patients are medically necessary and that the care provided meets or exceeds current health care quality standards.

We honor our patients' rights regarding their care by allowing them to choose which services are provided, who provides those services and who they would like their care to be transferred to after they are discharged from the hospital. By allowing patients to choose, they are in control of their health and well-being. Our working relationship with health care organizations and professionals, including physicians, skilled nursing facilities, board and care institutions, home health and hospice agencies, and others are based on appropriate business practices which are free from any incentives that limit patient choice or create business conflicts among organizations or professionals.

One quality measure is our ongoing accreditation by The Joint Commission (TJC). To maintain accreditation, the hospital

conducts a number of activities that focus on quality of care to ensure that our patients receive the best care possible in a safe and friendly setting.

Compliance with Laws and Regulations

We are committed to complying with all laws, regulations, standards, and other compliance requirements that apply to the business of Huntington Health.

Huntington Health is governed by numerous legal and regulatory requirements. We are committed to abiding by all laws and regulations that govern our industry. We recognize that laws and regulations exist to protect our patients, employees, payers and all who work with the hospital to provide high quality care. We are honest in our dealings with others. We are people of integrity.

Fraud, Waste and Abuse

Fraud is the intentional deception or misrepresentation of services that could result in an unauthorized benefit. Waste is the overutilization of services that may result in unnecessary costs to the health care system. Abuse involves any actions that may result in unnecessary costs to the health care system and could involve improper payment for services that failed to meet professionally recognized standards of care and services.

Employees must not make false statements or misrepresentations at any time and must be sure to adhere to the highest ethical standards in conducting business. Employees must not engage in any of the following activities, all of which are prohibited by law:

- Billing for supplies or services not rendered
- Upcoding or inappropriately billing of actual services rendered
- Misrepresenting or duplicate billing of services actually rendered
- Falsely certifying that services were medically necessary
- Seeking to collect amounts exceeding the copayment and deductible from a Medicare or medical beneficiary who has assigned benefits
- Soliciting, offering or receiving a kickback, bribe or rebate in exchange for patient referrals or other organizational services

We are dedicated to eliminating fraud, waste and abuse and through audits we help to ensure we are monitoring these areas. If you believe you have witnessed fraud, waste and abuse, please inform your manager or the compliance officer. Reporters will not be discriminated or retaliated against in any manner.

Coding and Billing Integrity

We are committed to the proposition that all billings for patient services and other transactions must be properly documented and authorized by management. All records must be accurately and completely supported in the hospital's books and records.

Documentation

Documenting information about our patients is essential to assure that we provide high quality care. This documentation should be as correct and complete as possible.

Patient Charging

Patients should be charged only for those products or services which are received during the course of their care. We will not charge a patient for a product or service that we did not provide.

Coding and Billing

When patients are discharged, their medical records are reviewed, and diagnosis and procedure codes are assigned by the medical records department. These diagnosis and procedure codes are then translated into financial reimbursement codes which determine how the hospital is paid for its services. Since coding and billing activities result in payment to the hospital, these functions will be conducted with absolute integrity and exactness. Huntington Health will not manipulate coding or billing practices or submit false claims as a means of receiving more reimbursement from private and public health care payers than that which we are rightfully due.

If you observe any questionable conduct in relation to the manner in which Huntington Health documents, charges, codes or bills for its services, please inform your manager or contact the compliance officer, or the Compliance Hotline or WebLine.

Conflicts of Interest

We have a responsibility to Huntington Health, the community, and to our patients. Therefore, we are committed to avoiding any activity, practice, or act that conflicts with the interests of, or that could bring into question, Huntington Health's integrity.

Conflicts of interest arise when a person's individual desires conflict with the good of the organization or the best interests of our patients.

Relations with Patients and Families

On occasion, patients or their family members may wish to express their gratitude to us for providing high quality health care to them or their loved one. As a matter of policy, we should not accept gifts from patients or their family. An expression of gratitude through nominal, perishable items such as food or flowers are acceptable as long as they are shared with the entire department. The acceptance of money from a patient or family member is never appropriate. Any expressed desire to donate money to the hospital or its employees should be directed to the office of philanthropy at (626) 397-3241.

Relations with Vendors

Vendors provide the hospital with many valuable services and resources. We must be cautious, however, when it comes to our relations with vendors. We should not accept gifts from vendors that might give the appearance that we are favoring their business in exchange for items of value. If you have a question about relations with vendors that might pose a conflict of interest, contact your manager or the compliance officer for guidance.

Relations with Physicians and Other Health Care Professionals

Patients are referred to Huntington Health from physicians on our medical staff. Patients are referred to other health care professionals after they are discharged from the hospital. It is critical that all activities conducted on behalf of our patients are based solely on the clinical health care needs of the patient and not on any other benefit that we might receive as a result of the referral.

We should avoid giving items of value to physicians or other health care professionals that might appear that we are encouraging them to refer patients to us. We should also avoid receiving items of value from physicians or other health care professionals that might appear that we are benefiting as a result of referring patients to others. Stark law and Anti-Kickback Statute do not allow the exchange of anything of value for patient referrals. Huntington Health is committed to complying with all applicable conflict of interest laws to ensure that patients receive appropriate services.

Outside Business Interests

Sometimes employees are engaged in business ventures outside of the hospital. It is important to make sure that your outside business interests do not conflict with your role in the hospital. Any business venture that works with, or competes against, Huntington Health may place you in a conflict. If you think an outside business venture may conflict with your role at Huntington Health, you must contact the compliance officer for further clarification.

Human Resources

We are committed to attracting, retaining, and developing the highest quality and most dedicated workforce possible in today's market. The employees of Huntington Health are our most valuable asset. We strive to hire and promote people on the basis of their qualifications, performance and abilities, and are determined to provide a work environment free of any form of illegal discrimination or harassment, including sexual harassment. Further, Huntington Health is committed to maintaining a workplace where each employee's privacy, and personal dignity are respected and protected from offensive or threatening behavior.

Huntington Health is committed to promoting a work environment that provides a positive place for people to have a fulfilling and productive career and to provide opportunities for growth and development.

Harassment and Discrimination

Huntington Health respects the rights of all individuals. We are committed to fostering an environment where everyone has equal employment opportunity regardless of race, ethnicity, color, religion, age, sex, gender, gender identity or gender expression, national origin, ancestry, age, disability, medical condition, family care status, military or veteran status, marital status, sexual orientation, genetic information, political affiliation, socioeconomic status, educational background, any other protected classes and other characteristics that make us unique.

All forms of harassment are prohibited. Huntington Health's policy specifically prohibits sexual harassment and bullying. Management has a responsibility to maintain the workplace free of any form of harassment and bullying and to investigate allegations of inappropriate conduct when reported.

In support of these rights, Huntington Health does not allow verbal, physical, or visual conduct by anyone that sexually harasses, disrupts, or interferes with another's work performance or that creates an intimidating, offensive, or hostile work environment. Sexual harassment includes unwanted physical activities such as flirting, touching, and blocking normal movement or unwanted verbal activities such as offensive statements, nicknames, insults, invitations, or comments. Sexual harassment can also come in the form of suggestive visual items such as posters, cartoons, drawings, or pictures.

Behavioral Expectations

All Huntington Health employees are expected to demonstrate dignity, respect, courtesy, and cooperation when dealing with patients, visitors, and hospital team members. Employees are expected to work towards creating a positive and professional image in accordance with Huntington's commitment to service excellence and patient experience.

A code of conduct has been established for all to abide by which defines acceptable behaviors and behaviors that undermine a culture of safety, such as falsifying timekeeping records or misappropriation of hospital supplies. For more information on the code of conduct, refer to Administrative Policy and Procedure #840.3.

Workplace Violence

Huntington Health is committed to providing a work environment free from violence. Such behavior might include physical violence, verbal threats, intimidation, and other extreme interpersonal behavior.

We support a no tolerance policy for violence in the workplace by any employee or other person working within the hospital. Even threats made in jest could result in disciplinary action.

If you are made aware of any concern related to discrimination, harassment, or workplace violence, please contact your manager, the human resources department or the security department.

Safeguarding Property, Assets, and Information

We are committed to using our resources wisely and shall be accountable to ourselves and to others for their proper use.

Privacy and Security of Patient Information

When providing care to our patients, we collect personal information about their finances, social circumstances, and their health status. We respect our patients' right to privacy when it comes to using and sharing their health information. Patient information can be used to provide treatment, receive payment for treatment and for other activities that support the hospital's operations. Otherwise, it should be kept protected and confidential. Only those individuals with a direct care giving role or with a specific need to know to perform their job duties within the hospital should have access to patient information. Patient information should not be taken off the hospital's campus. Access to the hospital's computer systems is granted to those who have a specific need to perform their job duties within the hospital. Information accessed within these computer systems should be limited to only that which is necessary to accomplish the individual's role. Computer passwords should never be shared with others. We are the protectors of our patients' private and sensitive information. For a complete listing of all policies related to the privacy of patient information, refer to Administrative Policy and Procedure #150.

Physical Assets

Equipment, supplies, and our physical facilities play an important role in providing high quality health care to our patients. It is important that we care for these assets to ensure their proper use, availability and appearance. Care must also be taken that these items are not used inappropriately, damaged or taken from the hospital. One of our core values is stewardship. We are stewards over the property and assets of the hospital which means we are accountable for their proper care and use. If you see any conduct which places our assets at risk, please report such activity to your manager.

Maintaining a Safe Work Environment

We are committed to operating in an environment where the health, safety, privacy, and comfort of patients and employees comes first.

Safe Work Environment

Huntington Health is committed to providing a safe and healthy environment for our patients and all who come into the hospital. We are also committed to ensuring that those working at the hospital can perform their jobs effectively without endangering their health or the health of others.

The hospital maintains a safe and healthy environment in compliance with a number of laws and regulations. The hospital will eliminate or minimize, to the best of its ability, hazards to the health and safety of employees and patients. If you see any situation that appears to be unsafe, report it to your manager immediately or risk management at (626) 397-5165.

Patient Safety

The hospital's mission is to excel at the delivery of health care to our community. Our goal is to apply patient safety concepts in our daily patient care to eliminate patient harm. If you have concerns related to patient safety and risk management, please call the risk management department. We foster a non-punitive culture in which staff is encouraged to identify and communicate opportunities for improvement, report safety risks, and

near misses through chain of communication, electronic event reporting system, and hotline.

Responsible Conduct of Research

Huntington Health has a responsibility to its patients, staff, and its community to participate in research if the primary goal of that research is to improve the effectiveness of medical diagnosis, treatment, and prevention of disease. Huntington Health is committed to participating in research in an environment that complies with established law and ethics that pertain to the health, safety, privacy, rights and welfare of human subjects.

In order to preserve the integrity of our clinical research program, we strive to ensure that research is conducted with honesty, accuracy, efficiency, and objectivity. To achieve this goal:

- We ensure that all human subjects research is reviewed, approved, and maintains ongoing oversight by an Institutional Review Board.
- We ensure that participants fully understand the benefits and risks of the research by obtaining written informed consent prior to beginning any research activities.
- We protect the privacy rights of research participants.
- We collect, store, protect, and share data mindful of the need to maintain its integrity, validity, and accuracy.
- We ensure that reimbursement for research activities align with state and federal billing requirements and that financial and clinical resources are used wisely in support of research.
- We have processes and procedures for investigating allegations of research misconduct and for disclosing and managing financial interests that comply with U.S. Public Health Service regulations.

The hospital's clinical research committee, which consists of representatives from many hospital departments, must review and approve all research conducted at Huntington Health.

The Compliance Program

Huntington Health is committed to honoring and obeying all legal and regulatory requirements which govern its operations. To ensure compliance with the many laws that govern the industry, Huntington Health has established a Compliance Program.

The Compliance Program is designed to establish a culture within our organization that promotes prevention, detection and resolution of situations that are, or appear to be, in violation of legal or regulatory requirements and public and private payer requirements. A complete description of Huntington Health's Compliance Program can be found in the Compliance Program Manual.

Asking Questions and Reporting Concerns

All employees, volunteers, physicians, contractors, and vendors play a role in supporting and upholding our mission, core values and Standards of Conduct. We also have a duty to ask questions when we are unsure how to approach a situation or to report concerns when we believe that a violation of our Standards of Conduct or other legal and regulatory requirements has occurred. Huntington Health has several resources available to answer questions or address concerns. Employees are encouraged to bring questions and concerns to the attention of their manager. Managers are encouraged to have an open-door policy when it comes to receiving questions or concerns from employees or others working within their department. In many cases, managers will be able to answer questions or resolve concerns immediately. If managers are unable to answer the question or address the issue, they can contact the compliance officer for further guidance.

Volunteers, physicians, contractors, and others not employed with Huntington Health may contact any member of the hospital's management team or the compliance officer if they have questions or concerns.

There may be some situations where an individual feels uncomfortable bringing a question or concern to management's attention. It is still important to ask questions or voice concerns.

If you feel uncomfortable bringing a question or concern to your manager's attention or would prefer to direct your question or concern to someone else, several other resources are available to you: the compliance officer, the Compliance Hotline or WebLine.

The Compliance Officer

Huntington Health has a compliance officer. The compliance officer's responsibility is to ensure that the Compliance Program functions to receive questions and concerns about legal and regulatory issues and to address them appropriately. You may contact the compliance officer directly with any question or concern. Your identity will remain confidential to the greatest extent allowable by law if you would prefer to remain anonymous. Huntington Health's compliance officer can be reached at (626) 397-5335.

The Compliance Hotline and Compliance WebLine

Huntington Health has a Compliance Hotline and WebLine. The Hotline or WebLine can also be used to have questions answered or concerns addressed. These services are managed by an outside company. Calls or submissions can be made to the Hotline or WebLine and a callback number is used to receive the answer to your question or to obtain the status of your concern. You may also remain anonymous if you would prefer that your identity remain confidential.

The Compliance Hotline and WebLine are available 24 hours a day, 7 days a week. The Compliance Hotline is available through a toll-free telephone number at (866) 311-4231. The Compliance WebLine can be accessed from any computer with Internet access at hhcomplianceweblines.com.

Non-Retaliation

Huntington Health maintains a strict non-retaliation policy. This means that if you express a concern about an issue or report a violation, you will not be punished in any way for expressing your concern or making your report to the hospital or regulatory and accrediting agencies. This policy helps to protect those who come forward in good faith to report a concern that they believe could be a risk to the hospital.

Additional Resources

We encourage all employees, volunteers, physicians, contractors, and vendors to address their concerns directly with the hospital to ensure a timely and effective resolution of questions or issues. If you still feel that your concerns have not been addressed, below are some additional resources available to you:

Policies and Procedures

Many of the policies and procedures used throughout the hospital are available on the hospital's Intranet website.

Department of Health and Human Services (HHS)

Office of Inspector General Hotline
(800) HHS-TIPS
(800) 447-8477

The Joint Commission (TJC)

Complaint hotline: (800) 994-6610
Complaint email: complaint@jointcommission.org
Go to jointcommission.org for more information

Comments or Questions?

If you have any comments or questions related to Huntington Health's Standards of Conduct or if you have a question or concern related to any of the topics listed in this booklet, please feel free to contact Huntington Health's compliance officer at (626) 397-5335.

Huntington Health reserves the right to add, delete or modify policies and guidelines relative to the Standards of Conduct and the Compliance Program as laws and regulations change or as is necessary to carry out the hospital's mission and to meet the compliance needs of the organization.