



Code of Conduct

Dear Colleagues,

The mission of Children's Hospital Colorado is to improve the health of children through the provision of high-quality, coordinated programs of patient care, education, research, and advocacy. As we strive to be the leader in providing the best healthcare outcomes for children, our expectations for the highest level of ethical conduct are ingrained in our culture and everything we do.

The Children's Colorado Code of Conduct is simple: do the right thing. Our expectation is that all employees, providers, contract personnel, vendors, trainees, students, volunteers, board members, and others educate themselves and comply with all laws, regulations, and policies, and access resources as needed to resolve business and ethical dilemmas.

If you ever encounter a situation where the right choice is not clear, I encourage you to do any of the following:

- Refer to our policies and procedures, which can be found on My Children's Colorado
- Ask or speak to your team leader or leadership team
- Contact the Corporate Compliance Program

We hold ourselves to the highest standards of character and integrity and encourage everyone in the organization to share concerns when they arise. As you review the Code of Conduct, please think about how you can demonstrate its standards in your role at Children's Colorado. Ultimately, we each have the responsibility to do the right thing.

Thank you for your continued commitment to our patients, families, and our community.

Sincerely,



Jena Hausmann
President and Chief Executive Officer



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Mission

We are a mission driven organization. Our mission is to improve the health of children through the provision of high-quality, coordinated programs of **Patient Care, Advocacy, Education, and Research.**

Vision

CHILD HEALTH. REIMAGINED. REALIZED.

Values



For a child's sake...

We are a **caring community** called to honor the sacred trust of our patients, families, and each other through **humble expertise**, **generous service**, and **boundless creativity**.

...This is the moment.



Introduction

Ethics/Integrity

Everyone at Children's Hospital Colorado recognizes the privilege and responsibilities that come with caring for a child's health and well-being. We strive to provide high-quality and ethical care in all settings by following standards of care that are based upon the unique needs of our pediatric patients. We must maintain high ethical standards while operating in an environment of complex, ever-changing laws, regulations, accrediting standards and organizational policies.

We recognize that you may encounter uncertainty as you perform your duties on behalf of Children's Colorado. Ethics and compliance must be an integral part of your decision-making process. We have adopted this Code of Conduct as a written statement outlining a broad spectrum of ethical practices that direct our daily operations. The purpose of this Code of Conduct is to establish a common understanding of the standards of behavior expected of all team members.

We all have an obligation to take responsibility for our own conduct and cooperatively work with colleagues to establish consultative and collaborative workplaces where we are happy and proud to work. This Code of Conduct is intended to serve as a guide and reference for you to support your day-to-day decision making; however, no Code of Conduct can cover every situation you might face.

Requesting Guidance/Reporting Ethics and Compliance Concerns/Non-Retaliation

Concerns and questions about how to correctly handle situations frequently arise. When determining if a decision is ethical we often come across "gray areas." In those situations, ask yourself:

- o Which option will produce the most good and do the least harm?
- o Which option best respects the rights of everyone involved?
- o Which option treats people equally?
- o Which option best serves Children's Colorado as an organization?
- o Which option leads me to abide by the Code of Conduct?

We all have the responsibility to question and promptly report any activity that appears to violate this Code of Conduct or any laws, regulations, or Children's Colorado policies. We are committed to maintaining an environment where open and honest communication is the expectation, not the exception. You may request guidance or report concerns using one of several mechanisms available.

If you have ethical or compliance concerns, you should report them to your team leader, to the next level of leadership, or you may contact Human Resources or the Corporate Compliance Program (CCP). If you do not feel comfortable speaking directly to someone at Children's Colorado, you may also report concerns anonymously and/or confidentially to the Compliance Hotline via phone (1-866-568-5420) or online ([Corporate Compliance Program](#)).

We have a non-retaliation policy which means team members may not be disciplined, reprimanded, or retaliated against for reporting a potential problem (including safety or quality of care concerns) to appropriate personnel or outside regulatory agencies in an accurate or truthful manner. ([Non-Retaliation in Reporting Misconduct or Variances Policy](#))



Team Member Standards



Standards of Behavior

Quality and Safety

We commit to quality and safety in everything we do.

Communication

We use words and actions to communicate our commitment to excellence and integrity.

Ownership

We take ownership of opportunities and challenges.

Relationships

We build relationships to provide care and service with respect, compassion, and integrity.

Professionalism

We demonstrate professionalism in how we act, what we know, and how we treat others.

Teamwork

We work together toward a common vision.

Conflict of Interest

We have an obligation to conduct business within guidelines that prohibit actual or potential conflicts of interest. We rely on your judgment and discretion to avoid conflicts of interest and to seek guidance from leadership whenever you have doubt. Conflicts of interest may occur if your outside activities or personal interests influence or appear to influence your ability to make objective decisions relative to your job responsibilities. If the demands of any outside activities hinder or distract you from your job performance or cause you to use Children's Colorado resources inappropriately, a conflict of interest may also exist. If you are unsure whether an outside activity might constitute a conflict of interest, please speak with your team leader or contact the Corporate Compliance Program (CCP). ([Conflict of Interest - General Guidelines Policy](#))

We are required to disclose potential conflicts of interest to ensure important decisions are not influenced by such circumstances. If you are concerned that a potential conflict of interest may have a direct implication on patient care, please reference the Ethical Issues policy. ([Ethical Issues Policy](#))

Q. In appreciation of our business, a vendor occasionally invites me to dinner or other entertainment activities. Is it appropriate for me to accept the invitation?

A. Extending or accepting business courtesies may raise legal and ethical issues. Such activities may be undertaken only when they align with Children's Colorado's gift policy. ([Gifts Policy](#)).

Q. A local vendor has offered to pay for some of our team members to attend a conference to learn about a new product. They will pay all travel expenses. Is this a conflict of interest?

A. Accepting this offer could be construed as accepting a gift of greater than nominal value or an inducement for business from the vendor and therefore should not be accepted. If Children's Colorado believes that learning about the new product is worthwhile, it may elect to pay for team members to attend. When in doubt, discuss the situation with your team leader or the CCP.

Q. A vendor we do business with brings my department personnel lunch on occasion. Is this a conflict of interest?

A. Children's Colorado no longer allows vendors to bring in meals to team members per policy. ([Gifts Policy](#))

Q. I have been asked to give a presentation on child wellness to a professional group on a day during my scheduled work time. They have offered me an honorarium. May I accept the honorarium?

A. You may decline such payment or accept and submit it to Children's Colorado since you are speaking during your regularly scheduled work hours. There are certain circumstances where you may be allowed to personally accept honoraria. Please contact Human Resources or CCP if you are considering personally accepting an honorarium.

Q. I work in our emergency department and I am considering starting a business selling resuscitative equipment over the Internet. Is this considered a conflict of interest?

A. Your type of second employment may be a conflict of interest, and it is best to consult with CCP and your team leader for clarification before proceeding.

Harassment

We have the right to work in an environment free of harassment and disruptive behavior. We do not tolerate conduct by any team member that harasses, disrupts, or interferes with another team member's work performance or that creates an intimidating, offensive, or hostile work environment. ([Discrimination/Harassment Policy](#))

Alcohol and Drug-free Environment

We are committed to an alcohol and drug-free work environment to protect our patients and each other. Children's Colorado prohibits the unlawful manufacture, distribution, dispensation, possession, and/or use of a controlled or illegal substance, or any other substance that causes impairment, while working and/or while present at any Children's Colorado location. We recognize you may take prescription or over-the-counter drugs which could impair judgment or other skills required in job performance. However, you are expected to report to work in a fit condition to perform your duties. ([Drug and Alcohol Policy](#))

Non-Discrimination and Equal Employment Opportunity

We are committed to providing an equal employment opportunity environment. We must not discriminate against any individual based on age, race, ethnicity, national origin, ancestry, sex, creed, religion, pregnancy, disability (mental and physical), marital status, genetic information, gender expression, sexual orientation, veteran status, or other protected classification to the extent required by applicable laws. ([Equal Opportunity Employment Policy](#))

General Confidentiality

We recognize the need to maintain business and personnel information in the strictest confidence. If you have such information, you are expected to handle it in a manner to protect against improper access or use. We maintain confidentiality by only accessing information needed to do our jobs, keeping passwords private, and prohibiting unauthorized access and use of confidential information. ([Confidentiality Policy](#))

Appropriate Workplace Conduct

We act in an appropriate, professional, and collaborative manner while working at and/or while representing Children's Colorado. We focus on providing high-quality and compassionate care through expertise, service, and creativity.



Patient Care Standards

Patient Rights and Responsibilities

We consider our patients' families our partners in their child's care. We encourage respect for the personal preferences and values of each individual. Patients and/or families have rights and responsibilities that are posted throughout the Children's Colorado locations, on the intranet, and on childrenscolorado.org.

We respect the rights of patients and those authorized by federal and state laws to make healthcare decisions. When clinical decisions are in conflict and a choice needs to be made, patients, families, and team members can request an ethics consultation with the Ethics Committee 24/7 via the hospital operator (720-777-1234) or One-Call (720-777-3999).

Admission, Transfer, Discharge/Non-Discrimination

We admit, transfer, and discharge patients based on medical appropriateness. We do not discriminate on the basis of age, race, ethnicity, national origin, ancestry, sex, color, cultural, economic, and/or educational background, creed, religion, pregnancy, disability (mental and physical), marital status, genetic information, gender identity or expression, sexual orientation, veteran status, insurance status, ability to pay, or other protected classification to the extent required by relevant laws. ([Non-Discrimination of Patients Policy](#))

Patient Safety

We commit to a culture of safety through our behaviors, initiatives, and programs. We strive to provide our patients, families, team members, visitors, and community with a safe environment in which to heal, work, and visit. We focus on the continuous enhancement of safety and improvement of patient care by the identification, analysis, and reduction of risks.

Emergency Medical Treatment and Labor Act (EMTALA)

EMTALA is a federal statute that governs the treatment of all individuals and/or transfer of an individual who presents to a dedicated emergency department in a hospital that participates in federal and state healthcare programs, regardless of the individual's insurance status or ability to pay.

EMTALA obligates Children's Colorado to conduct a Medical Screening Exam (MSE) on all patients who present to an emergency department to assess whether an Emergency Medical Condition (EMC) exists. If a patient is determined to have an EMC, EMTALA requires Children's Colorado to stabilize the patient and treat the EMC (e.g., a pregnant woman in labor or an adult experiencing a Code Blue event). If Children's Colorado is unable to stabilize a patient within its capability, or if the patient requests, an appropriate transfer to another facility will be implemented. ([EMTALA \(Emergency Medical Treatment and Labor Act\) Policy](#))

Informed Consent

We adhere to our General and Informed Consent policy that defines who can legally provide and authorize consent and outlines the informed consent process. Our policy provides clarification of procedures that require informed consent in compliance with Colorado Consent Law and other various regulatory and accrediting bodies. ([Consent: General and Informed Policy](#))

Decision Making/Advance Directives

We involve patients and families in healthcare decisions and make medically appropriate recommendations. We discuss all treatment options including benefits and risks associated with each to ensure informed decision making. We facilitate discussions to understand patients' and families' goals of care. ([Advance Directives Policy](#))

We respect the rights of patients authorized by federal and state law to complete an Advanced Directive. Advance Directives ensure that patient's wishes are communicated when treatment decisions need to be made. The Department of Clinical Social Work or Risk Management can assist with education and completion of Advance Directives (720-777-6975).



Patient Privacy and Confidentiality

We are committed to following federal and state laws that require us to protect patients' Protected Health Information (PHI). We take this seriously and exercise caution when accessing and discussing PHI. You must not abuse your access to confidential information or even worse, abuse your position to discover confidential information that your job does not require you to know. Any violations of the confidentiality or HIPAA policies must be reported to the Privacy Officer. If questions arise regarding an obligation to maintain the confidentiality of information or the appropriateness of releasing information, you should seek guidance from your team leader or the Privacy Officer. ([HIPAA Privacy Rights Policy](#))

Q. I work in the Village Pavilion and do not provide direct patient care. Do I need to lock my computer when I leave my workstation unattended?

A. You must lock your computers when you leave any workstation unattended to avoid any breaches of PHI and/or confidential information. Regardless of your specific role within the organization and whether or not you provide direct patient care, you must lock your workstation when leaving it unattended.

Q. I am a pharmacist and accidentally faxed a prescription to the incorrect external pharmacy. What should I do?

A. This incident is considered an impermissible disclosure. An impermissible disclosure is defined as any disclosure of PHI to a person or entity that does not have lawful rights to such information. If you are aware of an actual or potential impermissible disclosure of PHI, immediately contact the Privacy Officer within the Corporate Compliance Program. All impermissible disclosures must be reviewed by the Privacy Officer to determine if they meet the requirements for notification under the HIPAA Breach Notification Rule. ([Privacy Breach Notification Policy](#))

Q. I am a nurse who provides direct patient care. A patient's legal guardian requested I print off medical records from the patient's last two clinic appointments. Am I allowed to print and provide such medical records as requested?

A. Per Children's Colorado policy, patients and individuals who have the legal right to access the patient's medical records must obtain records through the Health Information Management (HIM) representative (720-777-6343).

Q. One of my child's classmates was admitted to the hospital. Since I am a team member, may I look at the child's medical record?

A. If you are directly involved with the care of the child, the answer is yes, but only to the extent necessary to perform your job functions. You may not share this information with any individuals not authorized to receive the patient's Protected Health Information (PHI), including anyone at your child's school. If you are not involved with the child's care, you may not read the child's medical record as this would constitute as a snooping violation. For example, if you work as a physical therapist and have not been consulted to provide care, reading the chart would breach patient confidentiality. When accessing PHI, ask yourself: *Do I really need to know this information in order to do my job?*

Q. My child is currently a patient at Children's Colorado. I would like to know his lab results, but I do not want to wait for his doctor to call me. Since I have access to the electronic medical record, is it okay for me to look it up?

A. You should not use your access granted through your professional role for personal reasons. In this particular situation, you are the consumer of healthcare and must access your child's Protected Health Information (PHI) only through the proper channels per Children's Colorado policy just as any other patient's parent/guardian.



Ethical Business Standards

Gifts and Business Courtesies

To avoid influencing patient care and/or business decisions, you are discouraged from accepting gifts from or giving gifts to vendors, patients, and/or families. We have developed a policy to help guide you in determining when gifts can be accepted or given – if in doubt, talk to your team leader or call the Corporate Compliance Program. ([Gifts Policy](#))

Q. I work in an inpatient unit as a bedside nurse. A patient's mother brought the unit team members donuts for breakfast. Are we allowed to accept them?

A. You may accept perishable items from family members such as food or beverages. If you are considering accepting any other type of gift, please refer to Children's Colorado policy or contact the Corporate Compliance Program. ([Gifts Policy](#))

Conditions of Participation/Accreditation/Licensure

The Centers for Medicare and Medicaid Services (CMS) set forth standards to improve quality and protect the health and safety of patients. Children's Colorado must meet these standards in order to continue participating in Medicare and Medicaid programs.

The Joint Commission (JC) is an independent, not-for-profit organization that accredits Children's Colorado and we must follow its performance standards as well as applicable laws and regulations. The Joint Commission also investigates concerns reported by patients, families, team members, and the general public. If you feel that any concern you have raised is not being resolved by Children's Colorado, you may also contact the Joint Commission either through their website (complaint@jointcommission.org) or by calling 1-800-994-6610.

The Colorado Department of Public Health and Environment (CDPHE) grants Children's Colorado its license to operate as well as its certification to receive reimbursement from Medicare and Medicaid. Thus, we must adhere to federal and state laws and meet all regulatory requirements to maintain these licensures and certifications.

Team members or independent contractors in positions that require professional licenses, certifications, or other credentials are responsible for maintaining the current status of their credentials. We must comply at all times with federal and state requirements applicable to our respective disciplines.

Responding to Investigations and Inquiries

We cooperate with all lawful investigations and inquiries from governmental agencies. We must never conceal, destroy, alter, delay, or falsify any documents or information when responding to investigations or inquiries. Should you be contacted by a governmental agency representative, please contact your team leader, Accreditation, Corporate Compliance Program, and/or Legal Affairs so you may receive guidance on how to respond appropriately. Throughout all investigative processes Children's Colorado preserves and protects the legal rights of the organization, team members, and patients.

Proper Coding and Billing

We are committed to accurately coding and billing for services rendered at Children's Colorado. Due to federal law and payer contracts, we are required to identify the services performed, document medical necessity, and meet any pertinent electronic transaction requirements. The submission of improper claims for payment subjects Children's Colorado to criminal and significant financial penalties and exclusion from the Medicare and Medicaid programs. We must try our best to prevent errors. If you have any concerns regarding errors, improprieties, or suspicious circumstances, you must report them to your team leader, the Executive Director of Revenue Cycle, and/or the Corporate Compliance Program.

Document Retention

We use, maintain, and store complete and accurate records. All records will be destroyed after a retention period according to the procedures outlined in Children's Colorado's Records Retention policy. ([Records Retention Policy](#))





Ethical Business Standards (cont.)

Information Security and Data Security

We value the importance of data integrity, information security, and confidentiality of data/information and follow all relevant policies and procedures. You are responsible for signing and abiding by the Security User Agreement to protect yourself, the organization, as well as patient and business data that resides in your workplace. You must also maintain the confidentiality and security of access to your computer. Equal attention should be given to both patient and business data that resides in your workplace. ([Information Security Policy](#))

Resource Stewardship

We responsibly and efficiently use our many resources including people, finances, environment, time, and materials/supplies for Children's Colorado business purposes only.

Financial Reporting

We are committed to engaging in best business practices through accurate and detailed financial reporting as mandated by regulatory agencies. In order to promote the safeguarding of assets we must maintain an effective system of internal controls, such as auditing and monitoring, to ensure that records and accounts accurately reflect Children's Colorado's financial transactions.

Purchasing and Contracting Practices

We make purchasing and contracting decisions based on what is most economical and appropriate for Children's Colorado. Should you have any questions or concerns regarding such practices, please contact Materials Management. ([Contracts Policy](#)) ([Purchasing Authorization Policy](#))

Relationships with Competitors

We comply fully and completely with all federal and state anti-trust laws relevant to our operations to ensure fair competition for the benefit of the organization. To avoid the appearance of anti-competitive conduct, do not discuss pricing, salaries, or the market with competitors or potential competitors. You should avoid seeking or receiving information about a competitor through other non-public means if they know or have reason to believe the information is proprietary or confidential.

Exclusion/Sanction Checks

We routinely conduct exclusion checks to ensure vendors, team members, and applicants are not prohibited from participating in federal or state healthcare programs. ([Background Checks Policy](#))

Fundraising

Any activity with the purpose of raising funds for Children's Colorado or the Children's Hospital Colorado Foundation including donations, appeals, or sponsorship of events is considered fundraising. All fundraising efforts must be coordinated through the Children's Hospital Colorado Foundation.

Lobbying and Political Activity

We cannot engage in lobbying and political activities that may jeopardize the tax-exempt status of Children's Colorado. We must ensure our political activities are not viewed as actions taken on behalf of the organization. We may not contribute Children's Colorado resources to any political activity or otherwise act in violation of applicable federal laws. All lobbying and political activity must be coordinated through Child Health Advocacy. ([Advocacy and Government Affairs Policy](#))

Hazardous Waste

We respect the environment and strive to conserve natural resources while managing our daily operations. We utilize resources appropriately and efficiently, recycle when possible, dispose of all waste as mandated by laws and regulations, and work cooperatively with appropriate authorities to remedy any environmental contamination for which Children's Colorado may be responsible. If you have any questions regarding hazardous waste, please contact the Sustainability Specialist or refer to relevant policies. ([Pharmaceutical and Chemical Waste Management Plan Policy](#)) ([Hazardous Waste and Medical Waste Management Policy](#))

Copyrights, Intellectual Property, and Inventions

Children's Colorado owns the rights to copyrights, intellectual property, and inventions created by team members who utilized the organization's resources. We respect laws and regulations pertaining to our own and others' educational and research property. ([Copyright Infringement and Protection Policy](#)) ([Intellectual Property Developed by Children's Hospital Colorado Staff Policy](#))





Fraud, Waste, and Abuse

We are committed to preventing and detecting fraud, waste, and abuse. You are expected to refrain from conduct that may violate fraud and abuse laws. Such laws prohibit payments in exchange for referral of patients. It is also illegal to submit false, fraudulent, or misleading claims to the government or a third party payer such as claims for services not rendered, claims which characterize the service differently than the service actually provided, or claims which do not otherwise comply with applicable program or contractual requirements. Making false representations to any person or entity in order to gain or retain participation in a program or to obtain payment for any service is also strictly prohibited.

Various federal and state laws protect team members who in good faith report suspected fraud, waste, or abuse from adverse action including discharge, demotion, suspension, threats, harassment, or discrimination. ([Corporate Compliance Investigations of Potential Fraud and Abuse Policy](#))

The main federal and state false claims laws are summarized below. Additional information, including information on how to report fraud, waste, or abuse can be accessed at [Deficit Reduction Act \(DRA\) Special Report](#).

Relationships and Agreements with Physicians and other Business Partners

We do not provide incentives to community physicians, other health care providers, or anyone else in exchange for referrals. The regulations that govern our relationships with any business partner who is a potential referral source are harsh and complex. Violations of these laws have grave consequences for the organization and any individuals involved. We are not allowed to engage in any activity that could be construed as an improper referral or payment without prior review by appropriate Children's Colorado leaders and legal counsel. If you are contemplating making or accepting a referral and may receive something in return, or if you are entering into any type of financial relationship with a physician, please contact the Corporate Compliance Program (CCP) immediately.

The Anti-Kickback Statute

The federal Anti-Kickback Statute is a criminal statute that prohibits the exchange (or offer to exchange), of anything of value, in an effort to reward the referral of federal healthcare business. "Anything of value" includes things like gifts, free or reduced cost services, and/or use of Children's Colorado's assets without fair market value payment. Such remuneration or "kickbacks" are expressly forbidden. The Anti-Kickback Statute provides safe harbors for certain arrangements such as personal services and rental agreements, investments in ambulatory surgery centers, and payments to bona fide employees.

The Physician Self-Referral Law

The Physician Self-Referral Law, commonly referred to as the "Stark Law," prohibits a physician from making referrals for certain Designated Health Services (DHS) payable by Medicare to an entity with which he or she (or an immediate family member) has a financial relationship (ownership, investment, or compensation), unless an exception applies. The Stark Law provides exceptions for certain arrangements such as personal services and rental agreements, non-monetary compensation, medical staff incidental benefits, and payments to bona fide employees.

False Claims

The False Claims Act aims to deter fraudulent billing. It is used to discipline health care providers who knowingly submit false claims or knowingly make false statements to Medicare, Medicaid, or other federal health care programs, or knowingly retains an overpayment for more than 60 days. The Act provides for civil penalties of at least \$5,500 per claim up to \$11,000 per claim, plus three times the amount of damages, and potential exclusion from participation in Medicaid and other health care programs. Colorado and most other states where Children's Colorado's patients live also have state laws prohibiting the submission of false claims.

The False Claims Act includes a *qui tam* (whistleblower) provision that allows a private person to bring a lawsuit in the name of the United States if he or she has personal knowledge of a false claim. The claim must be presented to the government, which has 60 days to decide whether to intervene and pursue the action. If the government declines to proceed, the individual may independently pursue legal action.

The Exclusion Authorities

The Office of the Inspector General (OIG) has authority to exclude individuals from participating in federal health care programs, including Medicaid, for various reasons. Generally, federal health care programs will not pay for items or services furnished, ordered, prescribed, or supplied by an excluded individual or entity.

The Civil Monetary Penalties Law

The Civil Monetary Penalties Law authorizes the OIG to impose civil penalties for violations of the Anti-Kickback Statute and the Stark Law as well as a range of other violations. These violations include, but are not limited to, the following:

- o Submitting false claims;
- o Failing to provide an adequate medical screening examination for patients who present to a hospital emergency department with an emergency condition or in labor; and
- o Making false statements on applications or contracts to participate in a federal health care program.



Corporate Compliance Program

Purpose/Infrastructure

The purpose of the Corporate Compliance Program (CCP) is to ensure Children's Colorado acts in accordance with its mission, values, and ethical and legal obligations. The CCP is tasked with ensuring all Children's Colorado team members understand the important role they play in Children's Colorado's compliance efforts and what they must do to adhere to rules and regulations set forth by governing agencies and to uphold this Code of Conduct.

CCP activities are intended to be constructive and provide Children's Colorado with an opportunity to prevent and detect noncompliant behavior, to resolve noncompliant conduct, and to take actions necessary to prevent future noncompliance. Primary oversight of Children's Colorado's CCP efforts rests with the Children's Colorado Board of Directors. The Board has delegated day-to-day operational responsibilities for the CCP to the Corporate Compliance Officer and the Corporate Compliance team. ([Corporate Compliance](#))

Open Lines of Communication for Reporting Concerns

The CCP promotes adherence to applicable federal, state, and local laws as well as Children's Colorado's policies and procedures. If you have concerns regarding a potential violation of any law, regulation, policy, and/or procedure, you are expected to take action. Reports can be made anonymously and securely. Children's Colorado has a non-retaliation policy meaning there will be no retaliation or corrective action against any team member who reports a suspected violation in good faith. ([Corporate Compliance Hotline](#)) ([Non-Retaliation Policy](#))

How to report a concern:

- Consult with your team leader.
- Speak with the next level of leadership, such as your department or division head.
- Call the Corporate Compliance Program (720-777-2566).
- Call the Compliance Hotline which is available 24/7 (1-866-568-5420).
- Report through the Compliance Hotline via the intranet (www.childrenscolorado.alertline.com).

Communication, Training, and Education

The CCP offers educational trainings regarding various compliance issues to team members throughout the year. In addition, all team members are required to complete initial compliance training during new hire orientation and during annual training.

Auditing and Monitoring

The CCP conducts or directs periodic audits of departments to assess compliance with laws, regulations, standards, and policies. Occasionally, external auditors assist with the auditing process. While Corporate Compliance and leadership develop an annual auditing and monitoring plan, additional audits can be performed as needed. Audit results are provided to key stakeholders and involved personnel when appropriate.

Response and Prevention

Violations of the law, Children's Colorado policies, and the principles of our Code of Conduct will not be excused or tolerated for any reason. Appropriate corrective action will be taken by Children's Colorado to address incidents of non-compliance, which may include disciplinary action against any individuals responsible for misconduct.

Responsible Conduct of Research

The Research Compliance Office, a part of the CCP, devotes itself to upholding the highest standard of ethical principles and research integrity to ensure that research abides by applicable federal laws, regulations, state codes, and institutional policies governing human subject research. Research Compliance strives to foster a commitment to ethical and legally compliant conduct so that the clinical research enterprise embodies Children's Colorado's mission and values.



I certify that I have received, read, and agree to abide by the Children's Hospital of Colorado Code of Conduct. I understand that the Code of Conduct represents laws, policies, rules, and regulations applicable to Children's Hospital Colorado, and/or me. I understand that compliance with these laws, policies, rules, and regulations is mandatory.

Signature.....**Date**.....

Print Name.....



It is everyone's right and responsibility to report any activity that appears to violate the Children's Hospital Colorado Code of Conduct or any laws, regulations, or Children's Colorado policies. You may make a report by speaking to your team leader, the Corporate Compliance Program, or through the anonymous hotline via telephone (1-866-568-5420) or online (www.childrenscolorado.alertline.com).



Children's Hospital Colorado

Code of Conduct

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Discrimination is Against the Law. Children's Hospital Colorado complies with applicable Federal civil rights laws and does not discriminate on the basis of race, color, national origin, age, disability, or sex. Children's Hospital Colorado does not exclude people or treat them differently because of race, color, national origin, age, disability, or sex.

Children's Hospital Colorado provides free aids and services to people with disabilities to communicate effectively with us, such as: Qualified sign language interpreters, written information in other formats (large print, audio, accessible electronic formats, other formats). Children's Hospital Colorado provides free language services to people whose primary language is not English, such as: Qualified interpreters, information written in other languages.

If you need these services, contact the Medical Interpreters Department at 720.777.9800.

If you believe that Children's Hospital Colorado has failed to provide these services or discriminated in another way on the basis of race, color, national origin, age, disability, or sex, you can file a grievance with: Corporate Compliance Officer, 13123 E 16th Avenue, B450, Aurora, Colorado 80045, Phone: 720.777.1234, Fax: 720.777.7257, corporate.compliance@childrenscolorado.org. You can file a grievance in person or by mail, fax, or email. If you need help filing a grievance, the Corporate Compliance Officer is available to help you.

You can also file a civil rights complaint with the U.S. Department of Health and Human Services, Office for Civil Rights, electronically through the Office for Civil Rights Complaint Portal, available at ocportal.hhs.gov/ocr/portal/lobby.jsf, or by mail or phone at: U.S. Department of Health and Human Services 200 Independence Avenue, SW Room 509F, HHH Building Washington, D.C. 20201 1-800-368-1019, 800-537-7697 (TDD) Complaint forms are available at www.hhs.gov/ocr/office/file/index.html.

Children's Hospital Colorado complies with applicable Federal civil rights laws and does not discriminate on the basis of race, color, national origin, age, disability, or sex.

ATENCIÓN: si habla español, tiene a su disposición servicios gratuitos de asistencia lingüística. Llame al 1-720-777-9800.

CHÚ Ý: Nếu bạn nói Tiếng Việt, có các dịch vụ hỗ trợ ngôn ngữ miễn phí dành cho bạn. Gọi số 1-720-777-9800.

주의: 한국어를 사용하시는 경우, 언어 지원 서비스를 무료로 이용하실 수 있습니다. 1-720-777-9800 번으로 전화해 주십시오.

注意: 如果您使用繁體中文, 您可以免費獲得語言援助服務。請致電1-720-777-9800。

ВНИМАНИЕ: Если вы говорите на русском языке, то вам доступны бесплатные услуги перевода. Звоните 1-720-777-9800.

ማስታወሻ: የሚናገሩት ቋንቋ አማርኛ ከሆነ የትርጉም አገልግሎት ድርጅቶቻችን በ18 ሊያገኙዎት ተዘጋጅተዋል። ወደ ሚስተለው ቁጥር ይደውሉ 1-720-777-9800 (መስማት ስተሳናቸው ለጥ 720-777-9800-1 ለጥጥር ይጠቀሙ)።

ملحوظة: إننا نمتلك تذاكر اللغة، فإن خدمات المساعدة اللغوية تتوفر لك بلهجاتنا. اتصل برقم 1-720-777-9800-1

ACHTUNG: Wenn Sie Deutsch sprechen, stehen Ihnen kostenlos sprachliche Hilfsdienstleistungen zur Verfügung. Rufnummer: 1-720-777-9800.

ATTENTION : Si vous parlez français, des services d'aide linguistique vous sont proposés gratuitement. Appelez le 1-720-777-9800.

ध्यान दनु सेहसंगवाडने नेपाल बोल्नहनुठ भन लपाडको निम्न भाषा सहायता सवाहर् नःश्लक सूमा उपलब्ध छ । फोन गनु सेहर् 1-720-777-9800 ।

PAUNAWA: Kung nagsasalita ka ng Tagalog, maaari kang gumamit ng mga serbisyo ng tulong sa wika nang walang bayad. Tumawag sa 1-720-777-9800.

注意事項: 日本語を話される場合、無料の言語支援をご利用いただけます。1-720-777-9800まで、お電話にてご連絡ください。

Nti: O buru na asu lbo, asusu aka oasu n'efu, defu, aka. Call 1-720-777-9800.