



Code of Conduct

A Guide for Compliance:
Aligning Mission, Vision and Values



PeaceHealth

Code of Conduct

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Aligning Mission, Vision and Values

Effective Feb. 1, 2020



PeaceHealth



Dear Caregivers,

We share a collective duty to fulfill PeaceHealth's ethical and legal responsibilities, even as we fulfill our sacred Mission. We each play a vital role in upholding the integrity of PeaceHealth.

This Code of Conduct is intended to help you better understand PeaceHealth's Organizational Integrity Program and how it affects your work responsibilities. Please read it carefully and keep it close at hand. The Code of Conduct is approved by the Board of Directors as policy and is a foundational element of every caregiver's commitment to act with integrity and compassion.

It's an honor to serve in our ministry with you.

Liz Dunne

Liz Dunne

President and Chief Executive Officer

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Introduction


The PeaceHealth Code of Conduct provides guidelines, education and tools to help you meet your duties within our sacred Mission. Regardless of your role, this Code will help you to comply with the regulations and policies that PeaceHealth must uphold.

Caregiver Responsibilities

Compliance begins with you. All caregivers have a vital role in shaping our culture at PeaceHealth and are responsible to:

- Comply with the requirements and related policies that impact your daily work.
- Seek guidance if you are uncertain about a requirement.
- Speak up if you suspect violations are taking place.
- Complete required training courses assigned to you through My Learning on Crossroads.
- Review and adhere to this Code of Conduct.

Important Notices Throughout the Code

Key laws mentioned in this Code are marked with a shield icon: . You can find more information about key laws in our **Regulations Glossary** (page 43).



Policies in this Code are marked with the icon shown above. They will include information on where to find policies.

At the end of each chapter, you will find a “Q & A” related to the topic covered within that chapter.

To seek guidance or report suspected violations you can:

- Reach out to your supervisor,
- Report through the Integrity Hotline at **877-261-8031**, or
- Report online at peacehealth.alertline.com.

Remember, when reporting an issue to Organizational Integrity, you always have the option to remain anonymous.

You will also find a list of reporting options in the **Resources** section (page 41).

PeaceHealth is committed to a culture of non-retaliation whenever a caregiver reports an issue in good faith.

Caregiver to Caregiver

Living Our Values, One to Another

Mutual respect and collaboration are integral to the culture at PeaceHealth. Our compassion, caring and acceptance of individual differences supports a desirable workplace in which all feel respected and valued.

In this chapter, you will learn about:

- What Makes a Caregiver
- Following Our Policies
- Diversity, Equity and Inclusion
- Non-Discrimination
- Harassment and Bullying
- Respectful Conflict Management
- Promoting Safety and Well-Being
- Consensual Romantic Relationships
- Non-Retaliation



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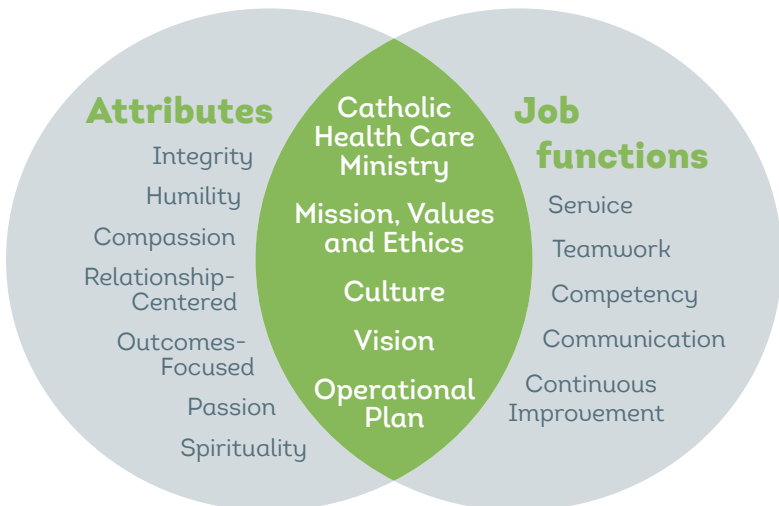
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Providence and Southwest Medical Clinic
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What Makes a Caregiver

At PeaceHealth, we call every employee a “caregiver,” regardless of role or title. Together, we all support care and service to PeaceHealth patients, families and to one another. Each of us is an extension of our ministry.

The PeaceHealth CAREGIVER MODEL



Following Our Policies

We must all be committed to a safe, ethical workplace as we strive to fulfill our Vision. In support of our commitment, PeaceHealth requires every caregiver to follow our policies and procedures. They represent expectations about our conduct and encourage us to do the right thing. They protect PeaceHealth and our patients, and you—our caregivers—and demonstrate our commitment to ethical standards and each other.

We have provided references to different policies within this Code to help you. These policies do not represent an exhaustive list, but are those that you are most likely to encounter. If you are unsure about a particular situation, we encourage you to reach out. You can use the **Resources** section (page 41) of this booklet, or visit our policy database on Crossroads:



Policies Database:
Crossroads > My Tools > Policies

Diversity, Equity and Inclusion

Our Mission calls on us to treat each person in a loving and caring way. Our Values guide us toward including and serving everyone according to their specific needs. We recognize and respect that each individual is defined not by a single characteristic, but by a combination of lived experiences, ideas, identities and healthcare needs.

PeaceHealth's emphasis on diversity, equity and inclusion requires all caregivers to be open and non-judgmental to new ideas and varied perspectives.

Diversity refers to the uniqueness of each person, a perspective that includes, but also sees beyond, the traditional bounds of race, ethnicity and other protected classes.

Inclusion means valuing diverse thoughts and perspectives, with the firm belief that only through embracing diversity can we meet the needs of our communities. This requires us to create workplace environments, care systems and healing environments that welcome diversity in all its forms. It is about the journey of understanding one another, and moving beyond tolerance to embrace and celebrate the richness found within each individual. It includes heartfelt respect and acknowledgement for cultural norms within social groups.

Consider Joining a Caregiver Affinity Group (CAG)

A CAG is a group of caregivers that share a common purpose, interest or background, mostly from traditionally underrepresented groups and their allies. You can find our CAGs on Crossroads:

System Resources > Diversity, Equity & Inclusion

Non-Discrimination

PeaceHealth prohibits discrimination or harassment on the basis of any protected class, including:

- Gender, sex, gender identity or gender expression
- Race, color, ethnicity or national origin
- Religion
- Disability
- Genetic information
- Age
- Sexual orientation
- Marital status
- Veteran status



HR Policies:
Crossroads > My HR > Policies

Harassment and Bullying

PeaceHealth does not tolerate harassment or bullying of any member of our workforce or community. PeaceHealth prohibits sexual harassment, sexual misconduct and sexual violence. Furthermore, we do not allow physical, verbal or nonverbal conduct that is hostile, intimidating, abusive or offensive.

What Is Considered "Harassment?"

Harassment includes unwanted conduct that threatens, intimidates, demeans, pressures or puts a person in fear of their safety. The following are examples of behaviors that can be considered harassment under PeaceHealth policies:

- Derogatory or vulgar statements, innuendoes, jokes, comments, rumors (including e-mails, blogs, social media posts, etc.), or negative conduct directed at a person specifically related to use of the federal Family and Medical Leave Act or state Family Leave Act, use of the workers' compensation system, or any other legally protected class (see page 8);
- Unwanted physical contact, including blocking movements;
- Sexually suggestive materials, such as magazines, calendars, posters, emails, etc.;
- Remarks about a person's anatomy or unwanted sexual compliments;
- Leering, whistles, or catcalls;
- Repeated, unwelcome pressure for dates or sex;
- Retaliating or threatening retaliation after a negative response to sexual advances;
- Ostracizing someone who reported discrimination or harassment.

What Is Considered Bullying?

Any behavior that is repeated, systematic and directed towards an individual or group of individuals which a reasonable person would expect to victimize, humiliate, undermine or threaten that individual or group and which creates a risk to health and safety. Intimidation is a form of bullying by which someone acts aggressively in a matter that causes someone else to reasonably fear physical harm. If you feel that you have been the victim of, or witness to discrimination or harassment, report it to Human Resources, or any of the reporting options found in our **Resources** section (page 41).

PeaceHealth is committed to a culture of non-retaliation whenever a caregiver reports an issue in good faith.

Respectful Conflict Management

While at PeaceHealth, you may have a conflict or disagreement with your coworkers. We each have control of how we manage a disagreement with others, and a responsibility to carry on our Mission by treating each other in a caring and loving way. PeaceHealth expects caregivers to manage conflict with appropriate behaviors including:

- Respectful listening
- Reflective responding
- Negotiation
- Open discussion
- Acknowledgment of differences
- Resolution-focused intent

When those closest to the situation are unable to resolve the matter, supervisors and managers should be brought in to assist. However, effective and respectful conflict resolution skills are expected of all caregivers.

If your attempts at conflict resolution are unsuccessful, or if you are not comfortable reaching out to your supervisor, you may instead report it to Human Resources. A list of reporting options is also available in our **Resources** section (page 41).

Promoting Safety and Well-Being

Our Vision calls on us to promote the safety and well-being of our patients and coworkers. We must always be careful to use safe and sound procedures, and report any issues that may compromise safety. Ensuring safety is everyone's job and requires a "speak-up" culture.

PeaceHealth has the opportunity to improve every time you ask a question or raise a concern. When you speak up to clarify a policy or report questionable conduct, you are protecting your coworkers, patients and the reputation of PeaceHealth.

Consensual Romantic Relationships

Romantic relationships may occur in our workplace. PeaceHealth policies do not seek to interfere with the private lives of caregivers. Rather, our policies provide guidelines to protect caregivers, our organization and our shared work environment.

Romantic relationships in the workplace have the potential to disrupt our work environment. They may also lead to other issues, such as: conflicts of interest or the appearance of a conflict of interest, concerns of favoritism, discrimination and possible sexual harassment.

Furthermore, PeaceHealth does not permit romantic relationships between a caregiver and any other caregiver who has actual or practical authority over them.

You may review our Consensual Romantic Relationships policy, or any of our HR policies, at any time on Crossroads.

Non-Retaliation

Retaliation occurs when an employer punishes an employee for reporting a concern about conduct that they believe in good faith could violate our policies or the law.

PeaceHealth does not tolerate retaliation of any kind. We encourage employees to raise good faith concerns so potential problems can be reviewed and addressed properly. This is an important part of building a healthy culture.

Caregiver to Caregiver

Questions & Answers

Q If I see that a caregiver is being made fun of for their race, what should I do?

A This kind of conduct is out of line with PeaceHealth's culture. If you are not comfortable intervening, you must report it (please see reporting options on page 41).

Q A fellow caregiver has made inappropriate comments about a coworker's appearance. No one seems offended, but it is inappropriate. Is there anything I can do about it?

A Yes, there is! You should bring this issue up with your supervisor or anyone in our **Resources** section (page 41). It's possible the individual doesn't realize how their behavior makes others feel. Regardless of their intentions, all caregivers deserve to work in a setting where they feel safe and secure.

Q A fellow caregiver yelled at me when no one else was around. It made me feel terrible. Can I do anything about it?

A Our culture does not support harassment or bullying for any reason. Behavior that would threaten, humiliate, undermine or embarrass any caregiver is unacceptable. You should discuss the situation with a supervisor, our human resources department or report it anonymously through our Integrity Hotline.

Serving Our Patients

Our Healing Mission Starts with You

Creating and fostering a culture of respect is the responsibility of every caregiver. It goes beyond just following the law. It speaks to who we are as people. It makes us more effective as a team. And ultimately, it helps us provide the best care possible.

In this chapter, you will learn about:

- Patient Privacy and Protected Health Information (HIPAA)
- Information Security (HIPAA/HITECH)
- Rewarding Patient Referrals (Stark Law/Anti-Kickback Statute)
- Fraud, Waste and Abuse
- Safe2Share



Patient Privacy and PHI (HIPAA)

PeaceHealth is committed to protecting our patients' protected health information (PHI) by following key laws that govern our relationships with patients:

What Is Protected Health Information (PHI)?

PHI is any health information, written, electronic or oral, that relates to:

- Key laws that govern our relationships with patients.
- An individual's past, present or future physical or mental health.
- Healthcare services provided to an identifiable individual and/or payment for their healthcare services.

How Can We Protect Patient Privacy?

We all play a role in protecting patient privacy. This means we are committed to:

- Access, use and/or disclose a patient's PHI only when necessary to do our job.
- Protect private information from being viewed by unauthorized persons.
- Dispose of sensitive documents, such as PHI, in a secure method, such as in specially marked bins or shredders.
- Refrain from discussing private information in public areas where it may be overheard.

Private Information

We protect more than patient PHI. We have a legal and ethical responsibility to protect the private and confidential information of our employees, students, volunteers, research subjects, patients, families and other members of the PeaceHealth community.

What Are Common HIPAA Violations?

The most common HIPAA violations include:

- Discussing patient information in a public place or with unauthorized people.
- Leaving print or electronic media where unauthorized people can read it.
- Accessing records without a job-related need-to-know.
- Sending PHI to the wrong place.
- Failing to encrypt PHI or establish basic password protections.

Use of Social Media

The PeaceHealth “Social Media Use” policy requires caregivers to be mindful of the PeaceHealth Mission and Values in how they present themselves and represent our organization when using social media.

Whether posting for business or personal reasons, caregivers should never post:

- PHI—This includes pictures, video or text, even if PHI is in the background.
- Gossip about a patient, even if you don’t specifically mention them by name.
- Confidential or proprietary PeaceHealth information.

Caregivers are expected to refrain from utilizing social media during work hours, with the exception of approved business-related activities and brief, occasional personal use during permitted breaks.

Caregivers should not use their PeaceHealth email address or include any reference to PeaceHealth in their personal username when posting online.

If you suspect a HIPAA privacy violation, report it immediately to your network Privacy and Integrity Officer, Organizational Integrity, or through the Integrity Hotline.

Privacy Policies:

Crossroads > System Departments >
Organizational Integrity



Information Security (HIPAA/HITECH)

HIPAA 🛡️ and HITECH 🛡️ regulations define our standards for protecting and securing electronic health information (or “e-PHI”).

E-PHI is a broad term that includes PHI that is used, created, stored, received or transmitted using any type of electronic information resource. This includes:

- Electronic records systems
- PCs
- Laptops
- Smartphones
- Tablets
- Cameras
- Email and other transmissions

Information Security is responsible for establishing our e-PHI security standards. If you have questions about our Information Security policies, contact our Manager of Information Security & Cyber-Risk at **360-729-1658**.



Information Security Policies:

Crossroads > System Departments >
Organizational Integrity

How Do I Secure My Device?

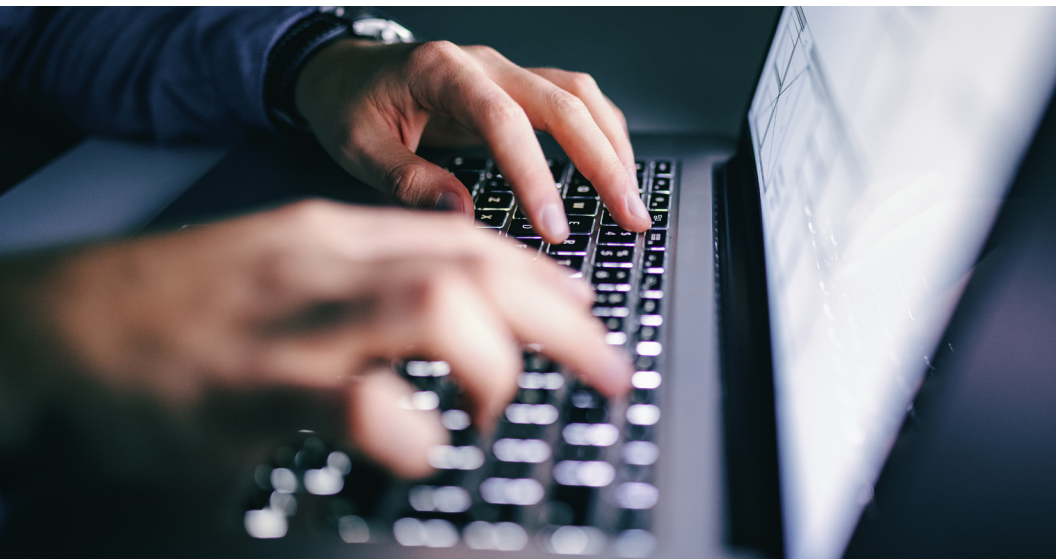
Our “*Work Area Information Security*” policy outlines requirements for keeping your device safe and secure. The following are safeguards to follow:

- Lock, log off or badge-out of your device when no longer in use, or when the device will be out of your sight.
- Use encryption and lock your device with other security controls such as pin codes or fingerprint locks.
- Never leave your computer unsecured while at home or on travel.
- If traveling by car, do not store devices where visible. If devices must be left in a vehicle, store in the trunk.

Software Installation

PeaceHealth caregivers should not install any software applications on PeaceHealth devices.

- TSP personnel will install any necessary applications.
- If you need an application installed, contact the PeaceHealth Service Desk at Ext. 6464 or 1-800-452-1425.



Email and Phishing

“Phishing” is the act of sending emails to trick people into giving away personal or confidential information.

Phishing emails aren’t always obvious. They can appear to be legitimate emails complete with convincing email addresses and logos.

Be cautious when opening emails by being aware of these tips:

- If the email comes from outside PeaceHealth, it will have a bright, red banner at the top that states:
EXTERNAL EMAIL, PLEASE STAY ALERT.
- Does the email ask for private information, such as login credentials? Don’t respond! PeaceHealth will never ask you to disclose confidential information through email.
- Does the email contain an attachment? NEVER open an attachment that you didn’t expect. It may contain a virus.

Unsure If An Email Is Safe?

If you are ever unsure about an email, report it to the PeaceHealth Service Desk at Ext. 6464 or 1-800-452-1425.

You can also report the email directly in Outlook by clicking on the “Report Message” button on the right side of the top navigation ribbon.

Encryption

You are required to use encryption when sending confidential information (such as PHI) or proprietary information outside of the PeaceHealth network. When sending confidential or proprietary information, please remember the following security protocols:


- Emails sent externally must be flagged as “Confidential” in the email’s settings, or;
- Type [secure], with brackets, in the subject line of the message. This notifies internal recipients that the message contains confidential information and to encrypt the message if the user intends to forward the email externally.
- Confidential information must never appear in the subject line of an email.



Encryption is required on devices and removable storage media (such as thumb drives) when information is written to them. Removal of encryption is prohibited from any device or other media supported by PeaceHealth.

Referrals


(Stark Law/Anti-Kickback Statute)

PeaceHealth caregivers must examine all relationships and arrangements with referral sources, providers and vendors to be certain there are no kickbacks or illegal incentives. We have detailed three of the regulations that place limits on patient referrals below. If you have any questions about these regulations, we welcome you to contact Organizational Integrity or our Legal Department.

- The [Anti-Kickback Statute](#)  prohibits giving, receiving, offering or asking for anything of value in return for business referrals. This includes both business partner or patient relationships.

- The **Stark Law**  is specific to physicians. This law prohibits physicians from referring patients to an entity with which they, or their immediate family, have a financial relationship.
- The **Patient Inducement Prohibition**  prohibits offering or paying rewards, incentives, discounts, or other items of value to Medicare/Medicaid patients if the offer is likely to influence that patient's decision in choosing a healthcare provider.

Fraud, Waste and Abuse

Every caregiver has a responsibility to prevent Fraud, Waste and Abuse (FWA) . FWA laws are designed to protect the social security trust fund. It's important you understand how to avoid activities that would lead to FWA. Here's how FWA are defined:

- **Fraud** is when a person has the intent to deceive in order to turn a profit. Examples of fraud include accepting or giving kickbacks for patient referrals, modifying medical records or a patient lying to get a prescription.
- **Waste** is the excessive or careless use of resources that result in unnecessary costs. An example of waste would be a provider prescribing an expensive name brand drug when generics exist.
- **Abuse** is similar to fraud, but may not have been done intentionally. An example of abuse would be prescribing or providing unnecessary services or tests.

Don't worry about these definitions when reporting suspected violations.

If you suspect a violation, report it. You can report to your network Privacy and Integrity Officer, Organizational Integrity, or through the Integrity Hotline.

Safe2Share

Safe2Share is PeaceHealth's systemwide, patient health reporting solution. Safe2Share provides a system for caregivers to report patient, caregiver or visitor safety concerns, events or injuries.

There are two ways to make a Safe2Share report:

- Crossroads > Report Incident and click on Patient/Visitor/Caregiver/Variance, or;
- From the Learning Home Dashboard in CareConnect.

Log into Safe2Share using your 3x3 and password OR anonymously to submit a report.

If you have any questions or need assistance with the Safe2Share tool, contact our Service Desk at Ext. 6464, or 1-800-452-1425.

Safe2Share helps us to provide 100% Perfect Care, Zero Harm—every time, every touch—to the patients we are called to serve.

Caregiver to Caregiver

Questions & Answers


Q Can I access my own health record, a friend's or a family member's?

A Caregivers are prohibited from accessing their own records. They are also prohibited from accessing PHI for any family member, friend or significant other.

Q I think I may have seen a HIPAA violation, but I'm not sure. Should I report it anyway?

A Yes! All caregivers have a duty to report suspected violations of the law or our Code. PeaceHealth's network Privacy and Integrity officers will determine what steps are necessary to resolve a suspected HIPAA violation.

Q I'll only be away from my computer for a moment. Do I still need to lock it?

A Yes! You should lock your computer any time it will be out of your sight. You can lock your computer by pressing the windows key  and "L" at the same time.

Right Relationships with Business Partners

Supporting and Engaging in Ethical Partnerships

We encourage engagement with our peers in order to provide the highest-quality care to our communities. Through establishing ethical partnerships built on mutual respect, we can collaborate to achieve our common goals.

In this chapter, you will learn about:

- Avoiding Conflicts of Interest
- Gifts and Giving
- Outside Activities
- Business Courtesies
- Excluded Individuals
- Criminal Background Checks
- Establishing Contracts



Avoiding Conflicts of Interest

What Is a Conflict of Interest?

A conflict of interest (COI) happens whenever you have an outside interest that could influence your ability to make an objective decision in your role at PeaceHealth. Even the appearance of a competing interest can be harmful.

What Do I Do if I Have a COI?

If you suspect you may have a COI, you must disclose it to Organizational Integrity:

- Upon hire for select job titles.
- Any time you suspect you have a COI.
- Annually on your work anniversary for select caregivers. *(Exceptions apply. See the policy referenced on the following page for more information).*

Submitting COI disclosures protects PeaceHealth from allegations of improper business practices, protecting you from accusations of bias.

What Are Some Examples of a COI?

- A pharmaceutical company offers you gifts or meals to thank you for prescribing, or encourage you to prescribe its medication(s) to patients.
- Your spouse has a stake in a company that PeaceHealth contracts with for services.
- You own a building that leases space to PeaceHealth.
- A vendor pays for you to travel to Hawaii to thank you for selecting them to provide food services to PeaceHealth.
- You refer patients for clinical services to a surgery center that you partially own.

These examples describe only a few types of conflicts you may encounter. If you are ever unsure if you are involved in a COI, you should report it to OI for review.

How Do I Submit a COI Disclosure Form?

You can submit a COI disclosure through any of the following methods:

- Crossroads:
System Departments > Organizational Integrity > Conflict of Interest disclosure form.
- Emailing OI directly:
OI-COIQuestions@peacehealth.org
- My Learning:
Search "OI Conflict of Interest", then enroll in the course. Submit the form available once you've completed the course.

What Happens After I Disclose a COI?

If it's determined that you have a COI, you will be issued a management plan. Follow the details of the management plan, or contact OI at:

OI-COIQuestions@peacehealth.org

Reassess your situation from time to time and be sure to submit a new disclosure form as soon as you suspect any new COIs.



Conflict of Interest Policies:

Crossroads > System Departments >
Organizational Integrity

Gifts and Giving

Institutional vs Personal

Institutional gifts and donations help to support to our Mission. Such gifts are directed to and accepted by the PeaceHealth Foundations. But what about personal gifts?

Accepting or Giving Personal Gifts

As healthcare workers, we must be extra diligent when considering accepting or giving personal gifts. There are many factors that need to be taken into consideration. When done responsibly, and by following our Gifts and Giving policies, accepting personal gifts can be done in a lawful and appropriate manner. However, when done inappropriately, gifting can undermine the integrity of PeaceHealth, create the perception of a COI or unfair advantage and violate the law.

To avoid a COI or violation of our policies or the law, make sure that you:

- Never give or receive a gift intended to induce patient referrals or healthcare business (see **Referrals** section on page 21)
- Never solicit a personal gift.
- Never accept a personal gift of cash or a cash equivalent, such as gift cards.
- Always report any gift valued **over \$50** to:
OI-COIQuestions@peacehealth.org
- Never accept a gift valued over \$100.
- Always evaluate the potential for the *appearance* that the gift could unduly influence you.

Outside Activities

PeaceHealth policy allows caregivers to engage in approved outside activities. Before engaging in any outside activities, caregivers are expected to disclose and have the activity approved by their supervisor.

PeaceHealth wants to support continuous improvement for all caregivers. However, outside activities such as consulting, board membership or outside employment may create a conflict of interest. Similarly, outside activities that take away from work time at PeaceHealth may interfere with our ability to provide the best possible care. In general, outside activities are acceptable as long as they do not:

- Compromise the ability of PeaceHealth to achieve its Mission;
- Compromise the ability of any caregiver to complete their duties, or fulfill the professional or institutional responsibilities for which PeaceHealth employs them;
- Damage the reputation or compromise the integrity of PeaceHealth or any of its caregivers;
- Divert any clinical practice or research activity that might appropriately be conducted within PeaceHealth; or
- Violate any of the provisions of the PeaceHealth conflict of interest policies.



“Acceptance of Gifts” Policies:

Crossroads > System Departments >
Organizational Integrity

Business Courtesies

Business courtesies are any kind of remuneration, money, gift, coupon, food, non-monetary compensation, or other value that PeaceHealth provides for free or at a discount to non-employed referral sources, their immediate family members, or their office staff. Under no circumstances may we ever give a gift if the intention is to induce or reward patient referrals or business.

Make sure you comply with the [Stark Law](#) 🛡️, [Anti-Kickback Statute](#) 🛡️ and [Patient Inducement Prohibition](#) anytime you give or receive a gift. If you have any questions, don't hesitate to contact OI directly at:

OI-COIQuestions@peacehealth.org.

Examples of non-monetary compensation include:

- Food
- Items
- Services
- Events
- Medical education credits
- Gifts
- Entertainment
- Vouchers or cash equivalents

Business courtesies must be tracked by the PeaceHealth caregiver providing them.

You Must Track Business Courtesies

You can submit business courtesies, or find more information on tracking business courtesies, online at:

[Crossroads > System Directory > OI > Business Courtesies](#)

Excluded Individuals

PeaceHealth does not employ or conduct business with any individual or entity that has been excluded or debarred from participating in any government funded program, including federal healthcare or state Medicaid programs.

Excluded/debarred screening is conducted using federal and state databases no less frequently than monthly.

Establishing Contracts

PeaceHealth policies ensure accountability by designating specific persons who are solely authorized to sign documents on behalf of PeaceHealth and its Foundations. You should not sign any agreement or contract on behalf of PeaceHealth unless you have been authorized to do so and have received approval from the Legal Department.

Additionally, you should not accept any terms and conditions on behalf of PeaceHealth for any services provided through the internet, or for any apps on your computer or phone unless approved in advance by PeaceHealth.



“Excluded Provider” Policy:

Crossroads > My Tools > Policies

Right Relationships with Business Partners

Questions & Answers

Q Can I ask a vendor to donate to a caregiver's personal celebration or event such as a birthday party at the workplace?

A No. You may not solicit a gift from a vendor at any time.

Q I was required to submit a COI disclosure earlier in the year, but may have another COI since I reported. Do I have to wait for next year to report this new COI?

A You should submit any new conflicts as soon as you suspect them. Although only select caregivers must submit a COI disclosure on a recurrent, annual basis, all caregivers are required to contact OI if you suspect you have a COI at any time. If you suspect you have a COI, you may contact OI directly at OI-COIQuestions@peacehealth.org with the details of the new potential conflict.

Q I am a PeaceHealth provider and pharmaceutical representatives sometimes give us perishable or consumable items. May I accept these?

A We can never accept or give a gift intended to reward or induce patient referrals. That said, you may accept a gift of perishable or consumable items, such as those given during holidays, and share it with your department. Any gift valued over \$50 must be reported. (See the **Resources** section on page 41.)

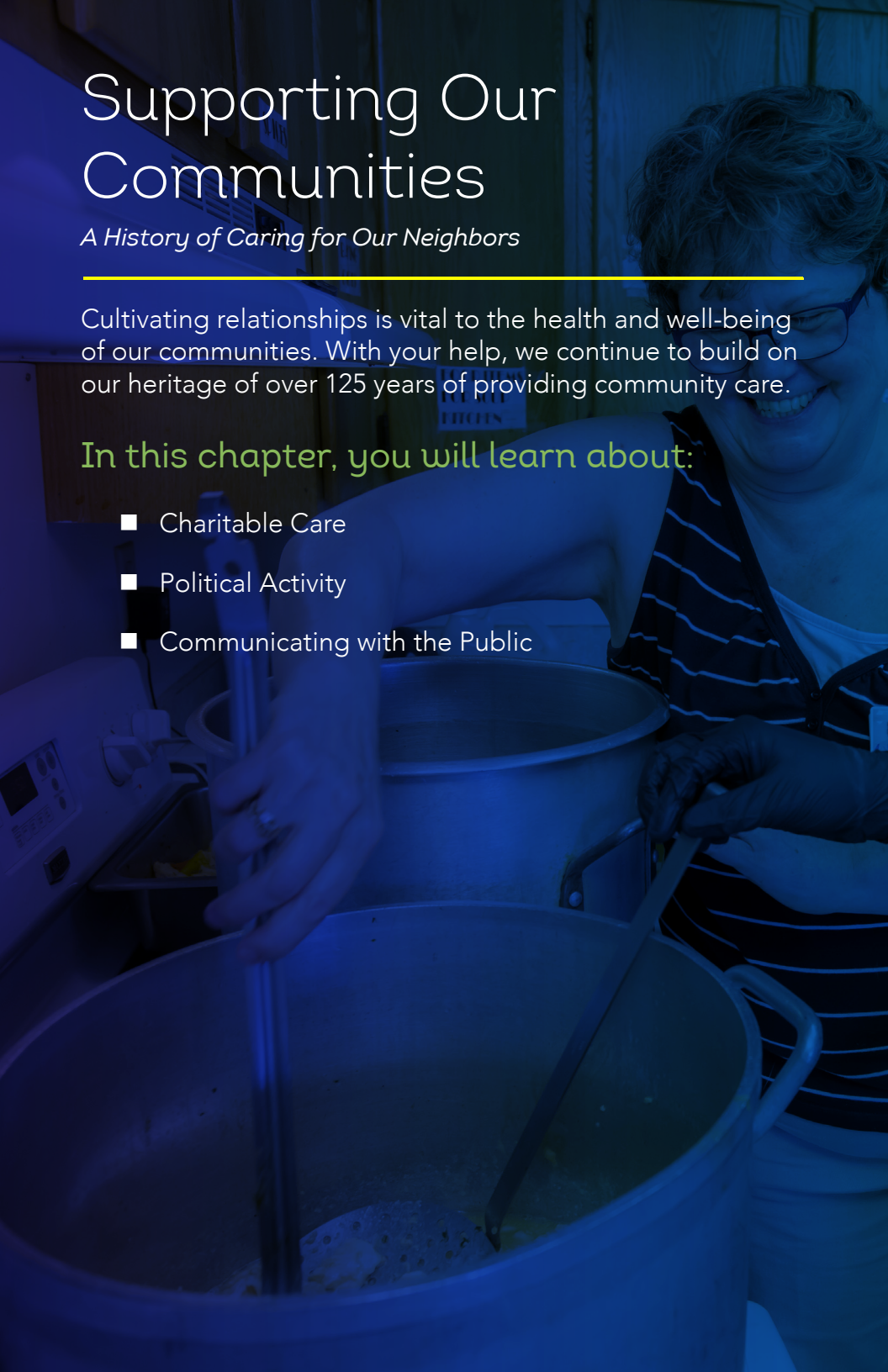
Supporting Our Communities

A History of Caring for Our Neighbors

Cultivating relationships is vital to the health and well-being of our communities. With your help, we continue to build on our heritage of over 125 years of providing community care.

In this chapter, you will learn about:

- Charitable Care
- Political Activity
- Communicating with the Public





Charitable Care

Our commitment to social justice calls on us to provide needed and appropriate care to all individuals in need, regardless of ability to pay for our services. To facilitate needed care while being responsible stewards of our limited resources, patients in need are provided with financial counseling services. Patients may apply for financial assistance before, during or after treatment, or at any time during the billing and collection process.

Financial counseling is the process of working with our patients in a compassionate and caring manner to identify options for resolving their PeaceHealth financial obligations. The provision of medically necessary healthcare should never be delayed pending financial assistance determination. PeaceHealth's Financial Assistance Program provides medically necessary and preventive services at a reduced cost or without charge when it has been determined that payment for those services cannot be obtained through insurance or other means.

“Financial Assistance” Policy:

Crossroads > My Tools > Policies



Political Activity

PeaceHealth caregivers are encouraged to vote and take part in the political process. However, tax-exempt regulations prohibit PeaceHealth, its operating units or individuals acting as representatives of PeaceHealth or its operating units, from political candidate campaign activities, and limit lobbying activities. PeaceHealth entities are prohibited from participating in the following political campaign activities:

- Publishing or distributing statements supporting a candidate for office.
- Making contributions to a candidate, a candidate's campaign committee or political action committee.
- Endorsing or opposing a candidate in any other way.
- Reimbursing any person for political contributions.

PeaceHealth caregivers and Board members who wish to be involved in supporting or opposing a political candidate must clearly indicate that they are expressing their personal political views, not those of PeaceHealth.



“Lobbying & Political Activity” Policy:

Crossroads > My Tools > Policies

Communicating with the Public

Our Marketing and Communications Department collaborates with caregivers at all levels to tell our story in a compelling and motivational way. They assist caregivers with communications planning, community outreach, social media content and crisis communications. All interactions with news media must be managed by Marketing and Communications. No other caregiver is authorized to speak with or provide information to any news media representative without prior approval by Marketing and Communications.

Our Marketing and Communications Department is responsible to:

- Cultivate relationships with members of the news media;
- Write and distribute news releases and engaging stories and;
- Respond to requests from reporters.

Supporting Our Communities

Questions & Answers

Q A news media representative has contacted me and would like to interview me about PeaceHealth. What do I do?

A Any contact from reporters or news media representatives should be sent to our Marketing and Communications Department for approval. You can contact them by email at Communications@peacehealth.org, or on Crossroads > Departments > Marketing & Communications.

Q I want to support a particular political candidate. Am I restricted from doing so?

A You may participate in supporting or opposing a political candidate as an individual acting on your own behalf. However, PeaceHealth representatives who are known publicly as a representative of PeaceHealth or its entities must disclose that they are representing their personal opinion, and not the views of PeaceHealth or its entities.

Q I want to talk about my work at PeaceHealth on my social media page. May I do so?

A When speaking about your work at PeaceHealth on social media, you must be sure not to post private or confidential information (see **Social Media Use** on page 23). You may also not post information as a representative of PeaceHealth. Any social media posts on behalf of PeaceHealth are done by our Marketing and Communications Department.

Resources

Human Resources

Contact Human Resources by phone, email or online:

- 1-855-333-MyHR Monday-Friday, 8 a.m. to 5 p.m. PT
- On Crossroads through My HR
- HRSC@peacehealth.org

Integrity Hotline

Report compliance questions or concerns through the Integrity Hotline online or by phone:

- Online at peacehealth.alertline.com, or;
- Via toll-free phone at 877-261-8031

PeaceHealth Service Desk

To report any concern related to your technology resources, laptops, mobile devices, tablets, use of email, software, hardware, etc., please contact the PeaceHealth Service Desk at 541-686-6464 or 1-800-452-1425.

Organizational Integrity

To reach the PeaceHealth OI Department, please call 360-729-1913, visit the OI website on Crossroads, or email us at any of the following addresses depending on the nature of your question:

- Compliance-related questions regarding hospital or clinical processes: HealthcareComplianceQuestions@peacehealth.org
- Conflicts of interest, gifts and giving, or exclusions questions: OI-COIQuestions@peacehealth.org
- Compliance-related educational questions, or questions related to My Learning courses: OI_HealthcareComplianceEducation@peacehealth.org

Resources (cont.)

Network Privacy and Integrity Officers

| | |
|--|--------------|
| System, Privacy and Integrity Investigations | 360-729-2925 |
| Northwest..... | 360-788-6307 |
| Columbia..... | 360-414-2049 |
| Oregon | 458-205-6959 |

Safe2Share

Safe2Share is PeaceHealth’s systemwide, patient health reporting solution. Safe2Share provides a system for caregivers to report patient, caregiver or visitor safety concerns, events or injuries.

There are two ways to make a Safe2Share report:

- Crossroads > Report Incident and click on Patient/Visitor/ Caregiver/Variance, or;
- From the Learning Home Dashboard in CareConnect.

Log into Safe2Share using your 3x3 and password OR anonymously to submit a report.

If you have any questions or need assistance with the Safe2Share tool, contact our Service Desk at Ext. 6464, or 1-800-452-1425.

Safe2Share will help us to provide 100% Perfect Care, Zero Harm—every time, every touch—to the patients we are called to serve.

Regulations Glossary

Using This Glossary

The glossary below includes the definitions of various federal and state laws, and PeaceHealth policies referenced within this guide.

If you have any questions about how these laws below apply to you or your work at PeaceHealth, please feel free to contact Organizational Integrity.

If you have a specific question about the nature of a law or regulation, you may also contact our Legal Department directly.

A

Anti-Kickback Statute

It is a felony to knowingly and willfully exchange, or offer to exchange, anything of value to induce or reward the referral of Federal healthcare program business. Providing free items to patients or referring providers, even as an act of kindness, can fall under this law.

F

False Claims Act

This federal law makes it a crime for any person or organization to knowingly make a false record, file a false claim regarding any federal healthcare program, such as Medicare or Medicaid, or conspire with others to commit a violation of the False Claims Act.

Fraud, Waste and Abuse

FWA refers to the misuse or exploitation of federal health care programs through various means. Intentionally deceptive practices, careless use of federal resources, or unintentional misuse represent different categories of FWA that must all be reported.

H

HIPAA

The Health Insurance Portability and Accountability Act (or "HIPAA") provides protections and obligations for patient privacy information. HIPAA includes limitations on what information healthcare providers may access and provides certain rights for patients over their PHI.

HITECH

These regulations describe the standards for protecting and securing electronic health information, called e-PHI.

P

Patient Inducement Prohibition

This law prohibits offering anything of value to Medicare/Medicaid patients that is likely to influence their decision in choosing a healthcare provider.

S

Stark Law

This law prohibits a physician from making a referral for services to an entity with which they or their immediate family has a financial relationship.

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Our Legacy

Our Mission and Values at PeaceHealth call us to the highest standard of accountability. Fidelity to the Code of Conduct is the ultimate expression of living our Values each day.

The Sisters of St. Joseph of Peace began a tradition of providing high-quality, compassionate healthcare over 125 years ago. Their legacy began in Bellingham and has spread to three states in the Pacific Northwest. The Sisters always went where they were invited and often where individuals did not have access to adequate healthcare. Even today, we as caregivers, continue the legacy to serve with privilege and honor.

Thank you for your commitment to share and carry on our values of Respect, Stewardship, Collaboration and Social Justice as a PeaceHealth caregiver.