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Owner: BETTY KASPARIE: VP, AUDIT, RISK & COMPLIANCE

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References:

Applicability: *Blessing Health System*

Blessing Hospital

Blessing Physician Services

Denman Services, Inc.

Illini Community Hospital

Code of Conduct

Policy Statement:

All employees, medical staff members, volunteers, students and Boards of Trustees/Directors are expected to be guided by the commitment of the organization to the highest standards of ethics and compliance. This policy applies to employees generally and only to the non-employees where specifically stated. Employees are responsible for knowing and following the Code of Conduct. In addition, professionals must follow the ethical standards dictated by their respective professional organizations. All employees will sign the Standards of Behavior at time of hire and receive a copy of the Code of Conduct within 30 days of hire; Board members and physicians will receive a copy at orientation. It is the responsibility of supervisors to see that staff in their areas receive adequate information and training to permit full compliance and to monitor compliance.

Standards of Conduct:

A. Personal Conduct

1. **We are honest in our communications and business relationships.**

Actions are a reflection upon the organization. You are expected to be honest in your communications with patients and families, attorneys, customers, staff members, auditors, Trustees, payers, vendors, suppliers, consultants, Governmental representatives and all of those with whom we do business. This means that no misleading statements may be made about our services or products or those of our competitors. It also means that you do not copy materials in violation of copyright laws or use confidential business information obtained from a competitor.

Employees of the Health System may not solicit personal gifts, business courtesies, or services from any patient, visitor, vendor, or contractor. Employees are to discourage receiving gifts. They should tell the patient, visitor, vendor, or contractor thank you, but inform them it is the BHS policy not to accept gifts. Gifts of cash or cash equivalents are never permissible (inclusive of gift cards and/or certificates). Refer to BCS policy, Employee Gifts, Gratuities, Business Courtesies, and Consultant Relationships.

You are expected to be honest in documentation of services provided, coding for services rendered, filing claims for reimbursement, in seeking payment for services, and filing reports whether for regulatory or accrediting purposes.

2. We respect confidentiality and privacy.

In the course of your job, you may have access to confidential information about patients and families, your coworkers or business practices. All information and records pertaining to patients, as well as proprietary information, are private and confidential and only authorized persons who must refer to them as a business necessity shall have access to them. You are expected to keep this information confidential and not discuss it with anyone without prior authorization. You are not to discuss internal issues in front of patients, their families or the public. You are not to engage in, or listen to, negativity or gossip. Listening without acting to stop it is the same as participating. You are to be respectful of the feelings, privacy, property, dignity, and rights of all customers. HIPAA policies provide guidelines to you related to the privacy of patient information. Employees, physicians, volunteers and students are expected to take steps to safeguard the Blessing entity's intellectual property, patient/client/customer information, trademarks, copyrights and other proprietary information, and to respect the intellectual property rights of others.

3. We will be respectful of each other.

You are expected to be respectful of other's time and work – remembering they are just as busy and important. Respect each other's privacy by keeping their care and information confidential. Respect your place of work by keeping areas clean. It is your responsibility to regulate the volume and content of your conversations, showing respect to the individuals involved in the conversation. You are expected to embrace the diversity of background, gender, ideas and other differences people bring to your team and daily work efforts.

4. We will be responsive, caring, concerned, friendly and respectful.

It is important all employees, medical staff, volunteers and students follow the standards of behavior of always identifying yourself and your role, respecting the individual's privacy, explaining what you are doing, helping others find their way, being courteous and responding quickly. It is important you make contact and greet everyone you meet and answer phones in a professional manner, identifying yourself and your location. It is expected you will give customers and visitors priority in hallways, elevators and parking areas. Personally escort individuals to their destinations when they are lost. These caring expectations should help employees and physicians improve the quality and effectiveness of their relationships and encounters with the public. You are expected to refrain from disruptive behavior because it may negatively impact the quality and safety of care, intimidate staff, affect morale, lead to turnovers or patients' choosing another provider. The following types of behaviors are considered disruptive: rude language, inappropriate gestures, threatening manners or statements, physical or verbal abuse, name calling, employees consistently arriving late for a meeting, and physicians arriving late to appointments or to begin clinical procedures or tests.

5. We do not offer or accept financial inducements.

You should not offer or accept any financial inducement, gift, payoff, kickback or bribe to induce, influence or reward favorable decisions of any government personnel or representative, any customer, physician, contractor or vendor in a commercial transaction, or any person in a position to benefit the organization or other staff in any way. You are strictly prohibited from engaging in any corrupt business practice either directly or indirectly. In accordance with the anti-referral and anti-kickback laws, you shall not make or offer payment or provide any other thing of value to another person with the understanding or intention that such payment or other thing of value is to be used for an unlawful or improper purpose.

6. We work to achieve/maintain a healthy and safe environment for everyone.

We will comply with all safety and health requirements established by the organization as well as federal, state and local laws of accrediting organizations. It is important to promptly report any

incidents involving injury to a patient, employee or visitor. We do not permit possession or consumption of alcohol or unauthorized drugs in the workplace, or reporting to work in an intoxicated manner or under the influence of drugs. Employees, physicians, volunteers and students may not perform work or operate the Blessing entity vehicles or other equipment while under the influence of drugs or alcoholic beverages. Blessing employees must follow the Drug/Alcohol Screening Program policy, which speaks to the possession and consumption of alcohol. [Under special circumstances, the BCS CEO may authorize serving of alcoholic beverages at special BCS functions for which the Blessing entity authorizes payment. (BCS CEO may delegate this authorization to Directors, Administrative Directors, Vice Presidents and entity Presidents/CEOs).] Weapons and other dangerous instruments are prohibited on all Blessing properties. Threats of weapons or violence are to be taken seriously and reported to your Manager, Security or to Human Resources. Refer to your specific organization policy on weapons. You are expected to know the disaster plan for your work area such that in the event of a disaster you are prepared to appropriately respond.

Infection Control policies and procedures have been developed for your safety and the safety of the patients and customers we all serve. You are expected to follow these policies related to such areas as hand washing, disposing of hazardous materials and handling of sharps.

7. We work to achieve a workplace that is free of discrimination or harassment.

You can be expected to be treated fairly without regard to race, color, religion, age, sex, ethnic origin, disability, sexual orientation, or any other protected status. This applies to hiring and other human resource practices and to the way we treat each other on a daily basis. This includes disruptive behavior or threats, derogatory comments or sexual harassment. Discrimination or harassment will not be tolerated. A prompt investigation will be conducted, and BCS will take appropriate corrective action where it is warranted. If you feel you have been subject to such behavior, you should notify your supervisor or Human Resources at 217-223-8400 ext. 6850.

8. We will submit properly incurred business expenses promptly and accurately.

Sometimes the organization may request that you travel or incur other expenses for business purposes. When traveling on business, all expenses will be paid according to Travel Policy for Blessing Health System. It is expected that the employee will promptly and accurately report all expenses documented with receipts.

9. Practitioners will maintain current licenses.

Practitioners in positions that require professional licenses, certifications or other credentials are responsible for maintaining current status of their credentials which includes maintaining the employee's legal name on all licenses/practice documentation and shall comply at all times with the federal and applicable state requirements for their discipline.

10. We will be accountable for our actions.

We believe accountability is critical to a successful organization and every employee is accountable for their actions or lack of action. You are expected to be a positive voice for Blessing Health System in the community. You are expected to work directly with co-workers to resolve issues and find solutions rather than assign blame or complain. You are expected to put the needs and desires of the customer first and approach every situation with an "I can" attitude.

B. Conduct in Service to Patients/Customers/Family

1. We will respect patient/customer rights.

Each patient/customer will be served on an individual basis and his/her dignity will be respected.

Every patient/customer should have the opportunity to understand the reasons for the recommended

treatment, how it will be accomplished, if follow-up consultations will be required and what role medications play. It is important to involve family when requested by the patient.

Admissions, transfers and/or discharges of patients from/to Blessing entities are based on the patient's clinical needs, and without regard to age, ancestry, color, disability, national origin, race, religion, sex, sexual orientation, or veteran status. In accordance with the Emergency Medical Treatment and Labor Act (EMTALA), hospitals are committed to providing an appropriate initial screening to anyone requesting it, without regard to their financial situation or insurance coverage.

2. Communications with Patients

Patients, families and/or visitors sometimes seek medical advice or information from an employee. Employees should not offer information about possible cures, remedies, diagnoses, prognoses or any other facts/options, which could be interpreted as medical advice. Refer all such requests to the attending or consulting physician.

3. We are committed to clinical quality and excellence in our service delivery.

It is your responsibility to raise concerns by following the organization's policy for addressing quality issues. It is an expectation you will offer assistance to those who appear to need help. Customers are the reason for all of us being here, not an interruption of our work. You are expected to follow through in a timely manner on questions posed to you and on commitments and requests, or seek assistance.

We are committed to gaining new knowledge and making improvements.

We believe we all need to be in a state of continuous learning and seeking new knowledge to enhance skills and ability to serve. You are responsible to continually evaluate the way you do work and make suggestions for improvement whenever possible. You need to embrace and act on change when performing your day-to-day work.

We are committed to exceeding our customer's expectations.

We will anticipate needs and look for ways to exceed customer expectations. We will give 100% of our attention when interacting with customers. We will provide extra comfort and reassurance to our customers.

C. Conducting Business on Behalf of a BCS Entity

1. We do business in accordance with antitrust laws.

You must not engage in any behavior that might interfere with fair competition. For example, federal and state antitrust laws prohibit price fixing and bid rigging as well as collusion, which includes sharing price or cost data with competitors under most circumstances. Boycotts, certain exclusive dealings and price discrimination agreements against competitors, vendors or purchasers, including bribery, misappropriations of trade secrets, deception, intimidation and similarly unfair practices are also covered by these laws.

2. We behave appropriately for a charitable organization.

As a charitable, tax-exempt organization, we have a legal and ethical obligation to use our resources in a way that promotes the public good rather than the private or personal interests of any individual. Therefore, we avoid compensation arrangements in excess of fair market value, accurately report payments appropriately to taxing authorities, and file all tax and information returns in accordance with applicable laws. It is also important to know that if you contribute to a political campaign, it is as an individual, not as a representative of BCS, and you must use your own personal funds. Both

hospitals offer to their communities a community benefit report detailing the activities the hospital provided during the year to deserve its charitable status. (Denman Services, Inc. is not a charitable, tax-exempt organization.)

3. We use the highest ethical business practices in source selection, negotiation, determination of award and in the administration of all purchasing activities.

Any rebates, discounts and allowances that are customary business practices are acceptable so long as they do not constitute unlawful or unethical payments and are given to the Blessing entity. Such payments should be properly documented, be of reasonable value, competitively justified and properly invoiced/credited to the entity originating the agreement. Any payment to employees of BCS is not allowed. If an unsolicited (cash) payment is received, it should be forwarded to the Blessing Foundation office or promptly returned to the giver. Payments made to vendors will be made only for goods and services acquired in accordance with Materials Management policies.

4. We do what is right for the organization when entering into agreements.

A conflict of interest may occur if your outside activities, personal financial interests or other personal interests influence or appear to influence your ability to make objective decisions in the course of your job responsibility. You are obligated to ensure that you remain free of conflicts of interest in the performance of your job. Board members, senior management, and other individuals with decision-making authority are required to disclose actual and potential conflicts related to decisions that arise during the year. Refer to the BCS policy, Conflict of Interest.

Never accept outside employment that may conflict with your position in the absence of prior written approval by an Vice President or CEO/President . It is important you do not use Blessing Health System resources to support your second job, use your position to influence the Blessing Health System doing business with your secondary employer/business or influence patient or customer referrals to your secondary employer/business.

5. We do not knowingly contract with persons or entities ineligible to participate in Federal healthcare programs.

The Federal government has authority to establish certain mandatory and discretionary exclusions for various types of misconduct such as convictions for program-related fraud and patient abuse, licensing board actions and default on Health Education Assistance loans. No payment may be made by Federal healthcare programs for any items or services furnished, ordered or prescribed by an excluded individual or entity.

6. We respect the environment.

BCS entities are subject to many legal requirements under a variety of environmental laws concerning the handling, release, transporting and disposal of hazardous materials and waste. If you handle or are responsible for hazardous materials or waste, you must be knowledgeable about these materials and the environmental regulations affecting them.

7. We market only services that are available.

Marketing will be truthful, accurate, complete and sensitive to the health care needs of the public, promoting informed choices about health care services. If you develop or approve marketing materials for the organization, the content must be consistent with the mission and values of the organization. The promotion materials must be data driven and not state or imply a guarantee of successful outcome or of complete patient satisfaction unless there is a basis for making such a claim.

8. Solicitation, canvassing or distribution of literature on the BCS property is restricted.

The purpose of this restriction is to prevent disruption in the operation and/or interference with patient care and other business. Guidance is provided by the solicitation and distribution of literature in the HR policy, Solicitation and Distribution of Literature.

9. **We are committed to compliance and do not put undue pressure to pursue profit over compliance.**

We believe it is critical that staff understand the importance of complying with laws and regulations. Staff should not be placed in a position of pursuing profit or meeting a budget requirement by sacrificing legal compliance. Examples might include pushing for a higher level of reimbursement without documentation to support the level assigned or signing contracts that violate Stark regulations to enhance revenue. If you believe you are being put in this position, report it to the Compliance Officer, 223-8400, ext. 6808 or the Compliance Hotline, ext. 5650.

10. **Electronic media systems are to be used primarily for business purposes.**

Data and information created, collected, aggregated, analyzed, stored and/or reported by or on behalf of a BCS entity are owned by the BCS entity. The electronic media systems are to be used primarily for business purposes, however, limited reasonable personal use of BCS communications systems are permitted. The E-mail and internet systems are not to be used for inappropriate, illicit or offensive communications. E-mail messages are considered to be business records of the BCS entity and therefore may be subject to review by management. Those who abuse the system will be disciplined accordingly. (Refer to the BCS policy Acceptable Use of Electronic Communication Tools

11. **We do not seek to improperly influence the decisions of our patients, customers or suppliers by offering business courtesies.**

A business courtesy is a gift, whether in money, service, perquisites, entertainment or other items provided to a business associate. You should not solicit a business courtesy from a business associate that is inconsistent with common business practices or interferes with your judgment and in the Blessing Health System's best interest. Business courtesies could include meals, conferences, hotels, travel, etc.

12. **We do not use hospital funds directly for political purposes.**

None of the Blessing entity names, funds or facilities shall be used for political purposes on behalf of candidates seeking political office. The Blessing entity may indirectly support political positions through membership in organizations like the Illinois Hospital Association and/or the American Hospital Association. Employees are encouraged to vote and participate in the political process.

13. **We will project a positive image of the Blessing Health System.**

As employees, physicians and volunteers, we owe the organization a duty to loyalty. We should be mindful that we represent the Blessing Health System in our day-to-day dealings with outsider contacts and can have significant influence over how our organization is perceived. It is each employee's responsibility to project positive comments about the Blessing Health System, its services, products, management, physicians, etc.

Scope:

All entities included now or hereafter on the organizational chart of Blessing Corporate Services, Inc., which individually may be referred to as a "Blessing Entity" or collectively as "Blessing Entities". Such entities presently include Blessing Corporate Services, Inc. ("BCS"), Blessing Hospital ("BH"), The Blessing Foundation, Inc. (the "Foundation"), BlessingCare Corporation d/b/a Illini Community Hospital ("Illini"), Denman Services, Inc. ("Denman"), and Blessing Physician Services ("BPS"). For purposes of this document, the term "Blessing Entities" means all of these organizations. BCS is the parent entity of the other Blessing Entities.

These policies are intended to apply to all Blessing Entities unless otherwise stated. "Blessing" or the "Blessing Health System" may also be used to refer to these organizations collectively.

Definitions:

Antitrust: Business practices that are intended to restrain fair competition.

Entity: An organization that has its own distinct corporate structure.

Inducement: To motivate or persuade by incentive, influence or persuasion.

Retaliation: To take or cause action to be taken, against an individual(s) as the result of some action against an individual or organization.

Procedure:

1. Employee Concerns

- A. Employees are encouraged to raise questions or concerns with management or the Compliance Officer.
- B. Retaliation against employees who raise concerns in good faith to any member of management will not be tolerated.

2. Education Requirements

- A. The Compliance Officer will establish a corporate ethics and business conduct education program designed to ensure that all employees have an awareness of the core principals and the Code of Conduct. At the time of hire, each employee will sign a document indicating receipt of the Code, understanding of the Code, and agreement to live by the Code.

3. Employment Application

- A. As part of the employment application process, a short version of the Code of Conduct entitled, "ICARE Standards" will be distributed for prospective employees to review and sign at time of hire.

4. Evaluation

- A. Each employee's compliance to the Code of Conduct and Standards of Behavior will be evaluated at the time of their annual evaluation.

Summary:

These principles form the basis for our commitment to ethical behavior that complies with all legal and regulatory requirements. However, this document cannot cover every legal or ethical issue that may arise. You must also use your own judgment.

If you have a concern about a legal or ethical issue, please report it to your supervisor. If you do not receive a satisfactory answer in a reasonable amount of time, please raise your concern to senior management or call the Corporate Compliance Officer at 217-223-8400, extension 6808 or call the hotline at 888-495-4387 and leave a detailed message.

Although calls to both the Compliance Officer and the hotline may remain anonymous, please remember that to enable a thorough investigation, you are encouraged to disclose as much information as possible, including names. Reports to Compliance will remain confidential to the fullest extent possible or as permitted by law.

ICARE Standards of Behavior

(for the form see [ICARE Standards of Behavior](#))

I Initiative

- I will seek knowledge to enhance my skills and use what I learn in my daily work.
- I will bring ideas for new opportunities and embrace change in the work place.
- I will always anticipate my customer's needs in order to create a positive experience.
- I will be proactive in earning and maintaining the trust of all customers.

C Communication

- I will consistently use AIDET in all encounters.
- I will actively listen to customers and find answers to questions asked of me.
- I will attempt to resolve conflict using open communication.
- I will be a positive voice of the Blessing Health System in the community.
- I will report concerns regarding compliance and privacy.

A Accountability

- I will put the needs of the customer first.
- I will keep our environment safe and clean.
- I will actively work to achieve the organizational goals.
- I will follow through in a timely manner on all workplace commitments.
- I will be responsible for the privacy of customers, by keeping all information confidential.
- I will consistently use best practices in the workplace.
- I will use all resources responsibly.
- I will conduct myself with the highest ethical standards.

R Respect

- I will honor diversity in the workplace.
- I will not engage in negativity or gossip.
- I will make eye contact, smile, and greet everyone I meet, offering to escort those who appear to need assistance.
- I will give customers priority in hallways, elevators, and parking areas.
- I will uphold the personal privacy, dignity, and rights of all customers.

E Exceed Expectations

- I will seek ways to exceed customer expectations.
- I will give 100% of my attention when interacting with customers, always putting them first.
- I will show empathy to every customer, every time.

Reference(s):

Prescription Drug Benefit Manual (Chapter 9, Part D) – Program to Control Fraud, Waste and Abuse

All revision dates:

02/2017, 01/2003

Attachments:

No Attachments

Approval Signatures

Step Description	Approver	Date
	MEGAN LAAKER: POLICY COORDINATOR	02/2017
BCS Corporate Leadership Council	PATRICK GERVELER: EVP/CHIEF FINANCIAL OFFICER	02/2017
BCS Corporate Leadership Council	MAUREEN KAHN: BCS PRES-CEO	02/2017
BCS Corporate Leadership Council	RICHARD KEMPE: EVP/CHIEF STRATEGY OFFICER	02/2017
BCS Corporate Leadership Council	KATHLEEN HULL: PRES,CEO-ILLINI COMMUNITY HOSP	02/2017
BCS Corporate Leadership Council	SCOTT KOELLIKER: EVP/BPS	02/2017
	BETTY KASPARIE: VP, AUDIT, RISK & COMPLIANCE	02/2017

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