

## POLICY

### **SUBJECT:** Standards of Conduct

Number: 1506

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Author: Feilmeier, Renae M

Facility: All Madonna Facilities

Level of Care: All Levels of Care

System: Quality/Risk Management

Department: Corporate Compliance

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### **DEFINITIONS:**

Workforce: Employees, students, volunteers and agency support personnel.

### **POLICY:**

Madonna will follow the Ethical and Religious Directives for Catholic Health Care Services. Our work will be performed in an ethical and legal manner, and we will comply with applicable laws and regulations. We are committed to assuring that our actions consistently reflect our values and beliefs. The Standards of Conduct outlined herein cover broad categories and cannot cover every situation but serve as a basis for the culture that will exist at Madonna. Organizational policies, processes, protocols, and procedures are maintained and available to every employee for assistance in correctly carrying out the services provided at Madonna.

### **PROCESS:**

1. **Admission and Discharge Practices:** Admission and discharge guidelines exist for all programs and services within Madonna and will be followed.
2. **Billing:** Employees will accurately code and bill. They will ensure that all billings reflect truth and accuracy, conforming to federal and state laws and regulations.
3. **Certification of Accreditation Review Bodies:** Madonna will provide authorized reviewing bodies with complete, factual, and accurate information.
4. **Clinical Services:** All colleagues, medical staff members, contract service providers, and other practitioners must be knowledgeable about and in compliance with laws and regulations and should immediately report suspected violations.
5. **Confidentiality and Security of Health Information:** No member of the workforce will reveal confidential patient health information to unauthorized persons. Madonna will ensure the authenticity of electronic and written medical records, provide appropriate access to medical records with proper authorization, and hold members of the workforce accountable for safeguarding protected health information.

6. **Conflict of Interest:** Employees are to avoid outside activities or interests which could influence or appear to influence their ability to make objective decisions in the course of their job responsibilities.
7. **Discrimination:** Madonna will prohibit and actively work to eliminate discrimination and harassment.
8. **Marketing:** Madonna will present truthful and complete information in all marketing and advertising.
9. **Medical Ethics:** Madonna maintains an active Medical Ethics Committee to assist patients, families, staff, and physicians in dealing with end-of-life and other ethical issues.
10. **Personal Obligation to Report:** Each person has an individual responsibility for reporting any activity by any colleague, physician, subcontractor, or vendor that appears to violate applicable laws, rules, regulations or these Standards of Conduct. You may speak with your supervisor, a member of the Corporate Compliance Committee, the Corporate Compliance Officer or call the Corporate Compliance Hotline. Federal and state whistleblower laws provide protection to any employee who reports suspected fraud or abuse under the False Claims Act.
11. **Provision of Care:** Clinical care is to be based on identified patient healthcare needs, not on patient or organizational economics. Services are to be medically necessary and appropriately documented.
12. **Purchase of Services/Materials:** Madonna will employ the highest ethical standards in its purchasing practices, including source selection, negotiation, determination of contract awards, and the administration of all purchasing activities.
13. **Referrals:** Madonna accepts patients based solely on the patient's clinical needs and our ability to provide the needed services. Madonna does not pay for referrals into our programs and does not accept payment for referrals we make.
14. **Scope of Practice:** All licensed members of Madonna's workforce will know and practice within their respective scope of practice acts. Licenses will be maintained as required.

## **Reporting a Concern**

Please question any process or action you think may raise an ethical or legal concern or violate one or more of these Standards of Conduct. If you have any such concerns, please take any of the following actions:

- Complete the Compliance Concern Reporting Form (“Form”) found on the Madonna intranet to provide a clear understanding of the concern so we may perform a proper investigation. Submit the Form to the Corporate Compliance Officer or the Director of Quality and Risk Management.
- Share your concern with your supervisor or manager. If you are not comfortable discussing your concern with your supervisor or manager or if you are not satisfied with the response, please contact the Corporate Compliance Officer or any member of the Corporate Compliance Committee.
- If you wish to report your concern anonymously, please call the Safety and Corporate Compliance Helpline at (402) 413-4891. Provide the information requested on the Form to ensure adequate detail is provided to properly investigate the concern.