

# The Saint Vincent Health System

## Code of Ethics

The Saint Vincent Health System Code of Ethics is a guiding set of principles for the operation of all Saint Vincent Health System entities. By its Code of Ethics, the health system requires that all persons employed, representing, or doing business with Saint Vincent Health System, including members of the medical staff, allied health professionals, associates, leaders, board members, and all vendors exhibit the highest standards of clinical and business ethics and conduct all clinical and administrative operations in accordance with the mission of Saint Vincent Health System and in compliance with all regulatory requirements. In keeping with the Saint Vincent mission, our fundamental objectives are to enhance the overall quality of life, dignity and well-being of every individual who needs health care services, and to create a more equitable, accessible, effective and efficient health care system.

We are a mission-driven workforce “...dedicated to bringing God’s healing love to all...” and we are obligated to act in ways that merit the trust, confidence and respect of our patients, the general public and our co-workers. Therefore, all persons who work for Saint Vincent Health System observe a Code of Ethics and are expected to adhere to the highest moral standards both on and off the job. Conduct that is illegal or not consistent with Saint Vincent Health System policy will result in disciplinary action, which may involve suspension or termination.

Under Corporate Compliance, observing our Code of Ethics is not only our responsibility; it is the law. Saint Vincent Health System is committed to complying with all federal, state and local laws and regulations. This Code of Ethics requires truthfulness, honesty and personal integrity. In general, the following apply to all Saint Vincent Health System associates and physicians or other persons affiliated with Saint Vincent..

### A. QUALITY PATIENT CARE

The highest priority for all associates - whether they work in clinical or non-clinical settings - is quality care for our patients and their family members. Physicians have the ultimate responsibility for decisions regarding patient diagnosis and treatment. Physicians, leaders and patient care associates are obligated to provide only appropriate and necessary care based on the patient’s needs regardless of gender, race, color, age, religion, creed, non-job-related disability, national origin, ancestry, veteran status, political affiliation or any other status legally protected by federal, state or local law. Policies & procedures and information about the relationship between the use of care, treatment and

services, and financial incentives as they relate to either referring to or using services are available to all patients, staff, licensed practitioners and contracted providers when requested. Patient rights and responsibilities as well as spiritual, religious and cultural beliefs and practices of patients and their family members must be understood and considered with the utmost respect. Physicians are obligated to discharge patients whose conditions no longer require health system services. To maintain the continuity of care, physicians and associates provide guidance and help to arrange alternative care delivery and/or specialized care not available through Saint Vincent Health System. Physicians and patient care associates are also required to provide patients with advance directives information and to support the patient's right to accept or refuse medical care. Adherence to our high quality patient care standards and the Saint Vincent Code of Ethics directly affect patient outcomes and demonstrate our compassion for our patients and their family members.

## B. CORPORATE COMPLIANCE

All persons working at a Saint Vincent Health System facility have the duty to understand and maintain a working knowledge of all laws, rules, regulations, and policies related to their responsibilities and areas. Our Corporate Compliance Program has been established to assist in the education of persons working at or with Saint Vincent entities in these requirements. Suspected or actual non-compliance with regulatory requirements and laws must be reported. All leaders have the duty to ensure that this reporting can be made without fear of reprisal. The duty to report a non-compliance issue is so important that failure to report will result in disciplinary action. This report of a non-compliance issue should be made to either an immediate supervisor or to the Saint Vincent Health System Corporate Compliance Officer. If desired, the report can also be made anonymously via the Compliance Hotline, toll free at (877) 451-8070. Associates and physicians are expected to cooperate with all inquiries and investigations that relate to suspected violations of the Saint Vincent Health System Code of Ethics, customer/patient relations issues or any regulatory requirements affecting the operation of the health system.

### ***Fraud, Abuse and The False Claims Act***

Our physicians and associates work hard to ensure that we create accurate and truthful patient bills and submit accurate claims for payment from any payer, including Medicare and Medicaid, commercial insurance, or our patients. It's the right thing to do, and federal and state laws require accuracy in health care billing.

The federal False Claims Act (31 USC 3729-33) makes it a crime for any person or organization to knowingly make a false record or file a false claim with the government

for payment. "Knowing" can include deliberate or reckless ignorance of facts that make the claim false. Penalties for violating the federal False Claims Act can be up to three times the value of the False Claim, plus from \$5,500 to \$11,000 in fines, per claim.

Examples of possible False Claims include someone knowingly billing Medicare for services that were not provided or were not ordered by a physician, services that are not medically necessary, accompanied by an illegal inducement or provided as the result of a prohibited referral, or for services that were provided at sub-standard quality where the government would not pay.

Saint Vincent Health System is committed to complying with all federal, state and local laws and regulations. As such, any person associated with Saint Vincent who suspects or knows a False Claim was filed for payment should notify the appropriate leader or the Corporate Compliance Officer so that the error can be corrected. He/she may also file a lawsuit in Federal Court on behalf of the government and, in some cases, receive a reward for bringing original information about a violation to the government's attention.

Pennsylvania also has a False Claims Act that allows a similar lawsuit in state court if a False Claim is filed with the state for payment, such as under Medicaid or Workers' Compensation.

Saint Vincent policy protects anyone who reports a suspected or actual violation from reprisal. The federal and state False Claims Acts also protect anyone who files a False Claim lawsuit from being fired, demoted, threatened or harassed by their employer for filing the suit.

Our Corporate Compliance Program supports compliance with the False Claims Act by:

- Monitoring and auditing to prevent or detect errors in coding or billing.
- Educating our physicians and associates that they are responsible to report any concern about a possible False Claim.
- Investigating all reported concerns and correcting any billing errors discovered.
- Protecting our associates from adverse action when they do the right thing and report any genuine concern. Saint Vincent will investigate any allegation of retaliation against an associate for speaking up.

#### A. BUSINESS PRACTICES

All information concerning Saint Vincent Health System business, associates and medical staff must be held in strict confidence. It must not be discussed with persons not needing to know such information and certainly never with people outside the health system. As responsible stewards of health system resources, all Saint Vincent Health System associates, physicians and board members are expected to exercise good faith and honesty

when conducting business on behalf of the health system and to comply with all applicable bylaws, rules, regulations and policies.

Record Maintenance: All records, whether related to health system business matters or patients, must be protected, maintained and retained in accordance with applicable laws and Saint Vincent Health System policy.

## B. LEADERSHIP

Leaders are responsible for promoting the Saint Vincent Health System Code of Ethics and leading by example. They must exemplify Saint Vincent Health System's high ethical standards and practices and work to create a safe environment and culture that promotes high clinical and business standards. They must also maintain a working environment that is free from harassment, sexual and other; coercion of any kind, especially to perform illegal or unethical acts; and discrimination on the basis of gender, race, color, age, religion, creed, non-job-related disability, national origin, ancestry, veteran status, political affiliation or any other status legally protected by federal, state or local law. Our leaders must ensure that associates have a platform to freely express ethical concerns and provide mechanisms for discussing and addressing such concerns. Leaders are also charged with ensuring that their associates have sufficient information and resources to maintain compliance with regulatory and health system standards.

## C. COMMUNITY RELATIONS

Saint Vincent's effectiveness in meeting the needs of patients depends to a large degree on the confidence patients have in the health system. Patients and visitors may not understand the complexity of the care that is provided by Saint Vincent Health System, but they do understand the courtesy, concern, kindness, and compassion demonstrated by associates. It is also extremely important that all associates take an active interest in contributing to the best possible relationship between Saint Vincent Health System and the community by continuously working to improve the availability and provision for health promotion, education and patient care. Associates must also work closely with other community and regional health care organizations and professionals to share solutions for providing care to the residents of the areas we serve.

## D. MARKETING AND PUBLIC RELATIONS

Associates and leaders involved in marketing and public relations practices for Saint Vincent Health System promote health system activities, health care services and job and educational opportunities to the residents of the communities we serve to enable them to make enlightened judgments and decisions regarding services. Marketing and advertising materials and ads should reflect health system services and levels of licensure and certification in a fully informative, non-deceptive manner.

## E. CONFLICT OF INTEREST

Conflicting situations may arise where an associate is performing services outside of work. While associates have many competing demands for their time and energy, associates are always expected to give first priority to their employment relationship with Saint Vincent Health System. Outside working relationships must not conflict with the goals and objectives of Saint Vincent Health System. Associate activities, which might present conflicts with the goals or services of Saint Vincent Health System, must be reported to department management.

Leaders, Medical Staff and Board Members: It is the duty of all leaders, board members and medical staff members to act in the best interests of Saint Vincent Health System in all transactions related to their duties on behalf of the health system. In the event any leader, board member or medical staff member has any direct or indirect interest in, or potential benefit from, any individual, corporation or organization that proposes to enter into any transaction with Saint Vincent Health System for the sale, purchase, lease or rental of property, products or equipment, or to render or employ services, personal or otherwise, the leader, board member or medical staff member must immediately notify the Saint Vincent Health System president and CEO of such interest or potential benefit and shall thereafter refrain from voting or otherwise attempting to exert either directly or indirectly any influence on the Saint Vincent Health System to affect its decision to participate or not participate in such transaction or services. Saint Vincent leaders, medical staff members and board members must disclose outside employment activities that may conflict with the interests of the health system. It is possible that such disclosure may result in request for resignation from the board of trustees, medical staff or leadership staff.

Tips and Gifts: It is rewarding to an associate when a patient or relative appreciates services, but associates are reminded that they cannot accept gifts of cash or cash equivalents from patients. Be polite yet firm in refusing the gift, and explain that, according to health system policy, associates are not to accept these gifts. It is the policy of Saint Vincent Health System that associates, leaders, medical staff and board members, allied health professionals and vendors may not accept or extend a gift or business courtesy in order to influence purchasing decisions, patient care or referrals. However, gifts valued at \$100 or less that are given by any person or organization that has a business relationship with Saint Vincent Health System may be accepted by associates and medical staff members. Monetary gifts should be sent to the Saint Vincent Foundation. Perishable or consumable gifts given by a patient, person or organization that does business with Saint Vincent Health System are not subject to a specific dollar amount.

## H. CONFLICT OF CONSCIENCE

Saint Vincent recognizes patient care responsibilities may, at times, create a conflict with associates' religious, ethical and/or cultural beliefs ("conscience conflicts"). To provide associates with a mechanism for resolving such conflicts, the health system has established a procedure for requesting exclusion from an aspect of patient care based upon these beliefs. The paramount consideration when evaluating any requests is the impact on patient care.

## I. PRIVACY AND SECURITY OF INFORMATION

Saint Vincent Health System has a legal and ethical responsibility to safeguard the privacy of all patients and associates and to protect the confidentiality of their health information. It is the policy of Saint Vincent Health System to hold all associates, physicians and business partners to the levels of accountability outlined in applicable state and federal laws when in contact with confidential materials. Such information can be in the form of the written or spoken word and viewed in either hard copy or electronic form. Associates, physicians and business partners have a duty to keep information private and secure at all times while conducting treatment, processing claims and maintaining health system operations. Access to information systems is only granted after the associate has demonstrated a need for access, and the associate has signed a confidentiality agreement to use the information and/or system to conduct health system business. Breach of confidentiality and misuse of any information system are considered serious violations of policy and are dealt with according to health system corrective action and applicable federal laws.