

### **Conflicts of Interest**

Conflicts of interest exist any time your activities or interests influence, or could influence, your decision-making related to your responsibilities as a member of medical staff. Appearances count when dealing with potential conflicts of interest

Examples of potential conflicts of interest include:

Using your influence to recommend the selection of a vendor, contractor, product or supply with which you have a financial interest or other relationship without disclosing such relationship to the organization.

Accepting gifts, monetary or in-kind, from a vendor or contractor as an inducement for you to use your influence or position on the medical staff as a basis for entering into a business relationship with the organization.

If you have any doubt whether a potential conflict of interest exists, treat the situation as if a conflict does exist until you have properly disclosed and resolved the matter through the CEO or Integrity and Compliance Official or other appropriate channel in your organization.

### **Respectful Work Environment**

The organization is committed to creating and maintaining a respectful work environment for all employees, caregivers, physicians and visitors. As a member of organization's medical staff, you should expect to be treated with respect. We also expect that you will treat everyone you encounter in our facilities with equal respect and fairness.

Employees, physicians and others who work in the organization are not expected to tolerate disrespectful behavior in the workplace, including behavior that is rude, embarrassing, belittling, threatening, intimidating and/or insulting or the use of loud, profane and abusive language in either public or private places. You are encouraged to report such behavior to your CEO or one of the other resources listed on the back of this brochure.

### **Excluded Providers**

As a recipient of funds from the Medicare and Medicaid programs, organization is prohibited from submitting any claims for services ordered, prescribed or provided by individuals or organizations excluded from participation in federal health care programs.

As a member of the medical staff, you must attest that you have not been convicted of, or charged with, a criminal offense related to health care, nor have you been listed by a state or federal agency as debarred, excluded or otherwise ineligible for participation in state or federally funded health care programs.

If you are notified that you have been excluded from participation in state or federally funded health care programs, you must notify your Medical Staff Affairs Office or your Integrity and Compliance Official immediately.

### **Where to Find Help**

If you have a question or concern about possible violations of law, regulation or these Standards of Conduct, you are encouraged to seek answers by contacting one of the following resources:

- Your Chief Medical Officer
- Chief Executive Officer
- Your Integrity and Compliance Official
- MHN Integrity Line at 1-888-616-1981

The Integrity Line is toll-free and staffed 24 hours a day, seven days a week by an outside organization on behalf of your hospital. Calls are not traced or recorded and the Integrity Line does not use Caller ID.

Thank You!

We appreciate your taking time to review this information and your commitment to supporting Right Relationships at the organization. If you would like to receive a copy of the complete Standards of Conduct, or if you have questions about information included in this brochure, please contact one of the individuals listed below.

Your Integrity and Compliance Official is:

Name  
Title  
Phone Number and Email Address

Your Chief Executive Officer is:

Name  
Title  
Phone Number and Email Address



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**Supporting Right Relationships –  
A Partnership with Our Medical  
Staff**

**24-Hour MHN IntegrityLine  
1-888-616-1981  
Use Code MHN**

## **Supporting Right Relationships – A Partnership with our Medical Staff**

As a member of the medical staff you serve as a trusted partner in the delivery of health care services to our community. The organization has implemented the Integrity and Compliance Program to ensure our operations are consistent with our mission and values and that we fully meet all applicable legal, ethical and professional standards,

This brochure provides information on our Integrity and Compliance Program, our Standards of Conduct and those areas that have particular application to our relationship with you as a member of the medical staff.

If you have any questions regarding this information, please contact your local Integrity and Compliance Official. Contact information for this individual is located on the back of the brochure.

### **The Integrity and Compliance Program**

The Integrity and Compliance Program provides policies, guidelines, education and tools to assist our employees and others who serve with us in understanding the various laws, regulations and professional standards that apply to our operations and in responding to issues and questions often encountered in the workplace. This program is not only concerned with complying with laws and regulations but also emphasizes ethical behavior and actions consistent with our mission and values. Basic principles such as treating others with respect and dignity, obeying the law and telling the truth, using good judgment, maintaining high ethical standards and raising concerns when appropriate are the foundation upon which the program is based.

The Chief Executive Officer has appointed an Integrity and Compliance Official who is a member of the management team. This person is responsible for the operation of the Integrity and Compliance Program. It is very important for you to know the identity of this individual and how to contact him or her, if needed. Contact information for the official is located on the back of this brochure.

### **Ethical Directives**

All physicians who are members of the medical staff of organization are expected to familiarize themselves with the Ethical Directives for providing services in our facilities. Consult your organization's CEO if you have questions or need further assistance.

## **The Standards of Conduct**

All employees, contract workers, volunteers and board members of organization have received the Standards of Conduct. The Standards of Conduct describe behaviors and conduct expected of all who work in organization, including members of the medical staff. The Standards of Conduct are designed to support “right relationships”, relationships with patients and others in our care, relationships with co-workers, vendors, business partners and others that assist in the delivery of care, relationships with the government and others that pay for the health care services we provide and relationships with our organizations and communities.

All who work in organization, including members of the medical staff, are expected to:

- Deliver services with compassion, dignity and respect
- Maintain a positive, courteous and customer-service oriented attitude towards patients, their families, co-workers and others
- Speak kindly to patients, their families, co-workers and others
- Act in the best interests of patients and others in our care
- Respond timely to requests for information, input or assistance
- Communicate with others in a clear, open and honest manner
- Attempt to directly address differences with co-workers
- Respect the diversity of others, including racial, ethnic, gender, religious or other differences
- Abstain from physical contact with co-workers and others who serve with you. Report harassment, intimidation or violence of any kind that you witness in the workplace.
- Deliver services in accordance with all professional standards
- Maintain complete, accurate and timely medical records
- Protect the privacy and confidentiality of all medical and proprietary business information
- Respect the individual privacy of co-workers and others

In addition, several areas described in the Standards of Conduct have particular applicability to you as a member of the medical staff and are described more fully below.

## **Fraud and Abuse**

The organization is subject to numerous laws and regulations that impact how we deliver health care services. The organization is committed to fully complying with all laws and regulations that apply to our health care ministry.

All who work in organization, including members of the medical staff, are expected to follow all requirements of government (e.g., Medicare and Medicaid) and other third-party payers, such as commercial insurance companies. These requirements generally include maintaining complete and accurate medical records and submitting only complete and accurate claims for services provided. Patient medical records, upon which such claims are submitted, must be complete and accurate, and conform to accepted professional standards for maintenance of such records.

You should be aware that the offer or exchange of money, goods, or any other thing of value in return for the referral of patients is strictly prohibited by federal and state law and by the organization's policies. Likewise, the same laws generally prohibit enticing patients or other customers to use or purchase an item or service paid for by the Medicare or Medicaid programs by offering something of value in return.

## **Tax Matters**

The organization is organized and operated exclusively for charitable purposes and to serve our communities. As a result the organization has both an ethical and a legal obligation to operate in a manner consistent with our charitable purpose. You should be aware that the tax regulations prohibit the improper use of the organization's assets to benefit individuals, including medical staff members, who are in a position to exercise significant influence over the business activities of the organization.

Financial transactions with medical staff members who refer patients to our facilities are subject to complex tax and fraud and abuse laws and regulations. The organization has established certain policies and procedures to ensure all such transactions fully comply with applicable laws and regulations. These policies generally require that all financial arrangements be documented in writing, be at terms consistent with fair market value, be reviewed by approved legal counsel and be approved by organization's board of directors.