POLICY STATEMENT:

All individuals at Holy Cross Hospital (the "Hospital") shall be treated with respect and dignity. All members of the Medical and Dental Staff (the "Medical Staff") should conduct themselves in a professional manner.

1. Collaboration, communication and collegiality are essential for the provision of safe and competent patient care. All Medical and Dental Staff members practicing in the hospital must treat others with respect, courtesy and dignity and conduct themselves in a professional manner.

2. This policy also addresses sexual harassment of employees, patients, members of the Medical and Dental Staff, volunteers, visitors and others, while acting as a member of the Medical Staff.

3. The protection of patients, employees, physicians and others in the hospital is a primary concern in dealing with all incidents of inappropriate conduct. Complying with existing law and providing an environment in which the highest ethical and professional standards are maintained is essential.

4. If an impairment issue is suspected, the issue should be referred to the Physician Health Committee as outlined in the Rules and Regulations of the Medical and Dental Staff.

Unacceptable conduct may include, but is not limited to:

1. Threatening or abusive language directed at patients, hospital personnel, members of the Medical and Dental Staff and others;
2. Degrading or demeaning comments regarding patients, families, hospital personnel, members of the Medical and Dental Staff and the hospital;
3. Offensive language and profanity;
4. Inappropriate physical contact that is threatening or intimidating;
5. Refusal to abide by the Medical and Dental Staff Bylaws and Rules and Regulations;
6. Sexual harassment, which is defined as any verbal and/or physical conduct of a sexual nature that is unwelcome and offensive. (See Rules and Regulations of the Medical Staff).

REPORTING AND SUBSEQUENT ACTION:

All reported incidents will initiate an investigation by the Medical and Dental Staff. Subsequent action may include: counseling; reprimand or warning; referral for evaluation or assistance; and/or corrective action, dismissal of a report found to be without merit. Any disciplinary/corrective action taken will be consistent with the procedures outlined in Article IX Corrective Action of the Bylaws of the Medical Staff.
1. Any practitioner, employee, or affected individual may report potentially disruptive conduct.

2. Nurses and other hospital employees who observe or are subjected to inappropriate conduct by a member of the Medical Staff should notify their supervisor or others as directed by Hospital policy.

3. Any medical and dental staff member who observes inappropriate conduct shall notify the President of the Medical Staff.

4. The individual reporting the incident will be requested to document the incident in writing. If the individual is unwilling to document it, the President of the Medical Staff may document it after attempting to find out why the individual does not wish to do so. Documentation should include the date and time of the incident, a description of the questionable behavior, the circumstances which precipitated the incident, names of other witnesses (if any), any action taken to intervene or remedy the incident, and the name and signature of the individual reporting the matter.

INVESTIGATION AND RESPONSE:

The report will be investigated by the President of the Medical Staff or his/her designee who may meet with the individual who reported the incident and any witnesses to ascertain the details. Unfounded reports may be dismissed. The President of the Medical Staff will refer the issue to the appropriate departmental Supervisory Committee. The practitioner who is the subject of the report will be provided an opportunity to review and respond to any allegations. For those matters not subject to the Medical Staff Bylaws' provisions on Corrective Action, the President of the Medical Staff, in consultation with the department chair, Supervisory Committee and/or Chief Medical Officer may investigate the matter as he/she/they view appropriate (e.g. with or without formal meetings) so long as the investigation is conducted in a manner intended in good faith to produce a fair and accurate assessment. All information will be maintained as confidential.

Referral to the Medical Executive Committee may occur at any point during the process for review and action. The Medical Executive Committee will be fully apprised of any actions taken previously. When making a referral to the Medical Executive Committee, the President of the Medical and Dental Staff or his/her designee may recommend a course of action.

The Medical Executive Committee may take additional steps to address the issue, including requiring the physician to meet with the full Medical Executive Committee, issue a letter of warning or reprimand, require the physician to obtain a psychiatric evaluation, require the physician to complete a behavior modification course. These actions do not entitle the practitioner to a hearing or appeal.

At any point, the Medical Executive Committee may also make a recommendation regarding the practitioner's continued appointment and clinical privileges that does entitle the physician to a hearing as outlined in the Bylaws of the Medical Staff.

Approved by Medical Executive Committee: September 2017
Code of Conduct – Supplement for Medical Staff

As a member of the medical staff of a Trinity Health hospital, you serve as a trusted partner in the delivery of health care services to our patients and community. The Trinity Health Mission Statement calls us to serve together in the spirit of the Gospel as a compassionate and transforming healing presence within our communities. Guided by our Core Values, we are committed to the delivery of people-centered care that leads to better health care, improved health outcomes, and overall lower costs for our patients, residents, members and communities we serve.

Trinity Health has established a system-wide Integrity and Compliance Program to support all who work in our health care ministry in understanding and following the laws, regulations, professional standards, and ethical commitments that apply. The Trinity Health Code of Conduct describes behaviors and actions expected of all who work in Trinity Health – colleagues, physicians, suppliers, board members and others. This Supplement describes those areas of the Code of Conduct that have particular application to our relationship with you as a member of the hospital's medical staff. If you have any questions regarding this information, please contact your Medical Staff Office or the Integrity & Compliance Officer at your Ministry. The complete Code of Conduct is available online at http://www.trinity-health.org/documents/codeofconduct.pdf.

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The following standards are expected of all clinical professionals who work in Trinity Health, including members the medical staff:

Professionalism

- Deliver people-centered, quality health care services with compassion, dignity and respect for each individual.
- Deliver services without regard to race, color, religion, gender, sexual orientation, marital status, national origin, citizenship, age, disability, genetic information, payer source, ability to pay, or any other characteristic protected by law.
- Maintain a positive and courteous customer service orientation.
- Demonstrate the highest levels of ethical and professional conduct at all times and under all circumstances.
- Speak professionally and respectfully to those with whom you work and whom you serve.
- Respond to requests for information or assistance in a timely and supportive manner.
- Behave in a manner that enhances a spirit of cooperation, mutual respect, a supportive team environment and trust among all members of the team.
• Deliver services in accordance with all professional standards that apply to your position.
• Create and maintain complete, timely and accurate medical records consistent with medical staff bylaws.
• Protect the privacy and confidentiality of all personal health information - electronic, paper or verbal - you may receive.
• Maintain appropriate licenses, certifications and other credentials required of your position.
• Abstain from inappropriate physical contact or inappropriate behavior with others.
• Report any harassment, intimidation or violence of any kind.
• Maintain a safe work environment by performing your duties and responsibilities free from the influence of drugs or alcohol.
• Protect the confidentiality of all peer review information.

**Commitment to Providing Quality Care that is Safe and Medically Appropriate**

• Commit to safety: every patient, every time.
• Speak up when you see a quality or safety issue and discuss mistakes you see with others so we can learn how to prevent future mistakes.
• Adhere to clinical guidelines and protocols that reflect evidence-based medicine.
• Actively engage and support efforts to improve quality of care, including organization-approved technology advancements.
• Actively participate in initiatives to improve care coordination between and among caregivers, community support agencies and other providers.
• Actively participate in initiatives to improve the health of the community as a whole.

**Advocating for Our Patient's Needs**

• Provide comfort for our patients, including prompt and effective response to their needs.
• Communicate clinical information to patients and their designees in a clear and timely manner.
• Discuss available treatment options openly with patients, or their designees, and involve them in decisions regarding their care.
• Provide care to all patients who arrive at your facility in an emergency, as defined by law, regardless of their ability to pay or source of payment.
• Clearly explain the outcome of any treatment or procedure to patients, or their designees, especially when outcomes differ significantly from expected results.
• Respect patient advance directives
• Address ethical conflicts that may arise in patient care, including end-of-life issues, by consulting your organization's medical ethics committee or Mission Officer.
• Provide care that is consistent with the *Ethical and Religious Directives for Catholic Health Care Services.*

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This Code of Conduct is effective: March 1, 2018.
Stewardship of Resources

- Properly use and protect all resources including materials and supplies, equipment, staff time and financial assets.
- Respect the environment and follow your organization's policies for the handling and disposal of hazardous materials and infectious waste.

Corporate Citizenship

- Act with honesty and integrity in all activities.
- Actively participate in training programs offered by your organization.
- Follow your organization's policies requiring the disclosure of outside activities or relationships that could represent a conflict of interest with your medical staff membership or role and any other responsibilities.
- Follow all requirements of Medicare, Medicaid, other federal and state health care programs, as well as those of commercial insurance companies and other third-party payers. These requirements generally involve:
  - Delivering high-quality, medically necessary and appropriate services.
  - Creating and maintaining complete and accurate medical records.
  - Submitting complete and accurate claims for services provided.
  - Protecting the privacy and security of health information we collect.
- Conduct all medical research activities consistent with the highest standards of ethics and integrity and in accordance with all federal and state laws and regulations, and your organization's Institutional Review Board policies.
- Immediately notify your Medical Staff Office if notified you have been excluded or debarred from participation in federal or state health care programs.

Where to Find Help

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

- Your Chief Medical Officer or Medical Staff Office
- Another member of your organization's senior management team
- Your Ministry's Integrity & Compliance Officer
- The Trinity Health Integrity and Compliance Line at 1-866-477-4661 or you may file a written report online at www.mycompliancereport.com using access code "THO"
Thank You!
We appreciate your taking time to review this information and our commitment to carrying out our Mission with the highest standards of ethical behavior. Your dedication and support is critical to this important effort.