

## Integrity & Compliance: Code of Conduct

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<b>Approved by:</b> Annice Cody (RHM Pres Holy Cross Hlth Ntwrk), Louis Damiano (RHM President)	<b>Next Review Date:</b> 05/29/2027
<b>Affected Departments:</b> All Colleagues (HCHealth)	

\*\*DO NOT MANUALLY ENTER ANY DATA ABOVE THIS LINE\*\*

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**Purpose** To outline the Holy Cross Health policy for appropriate and professional conduct.

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**Scope**

- All colleagues
- All physicians
- All contractors
- All members of the Board of Trustees
- All persons associated with or conducting business with Holy Cross Health

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**Policy Overview**

Holy Cross Health and Trinity Health have established the Code of Conduct describing the rights and responsibilities of colleagues, medical staff, board members, and all other persons associated with or conducting business with Holy Cross Health. Holy Cross Health expects all individuals to meet the Code of Conduct and adhere to all policies, procedures, and workplace practices. This policy complements the Code of Conduct, which should be reviewed in addition to this policy.

Holy Cross Health requires annual education about the integrity and compliance program and the Code of Conduct.

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**Purpose of Code of Conduct**

All persons associated with Holy Cross Health have a responsibility to exercise integrity, honesty, and sound judgment when performing job responsibilities. The code of conduct provides guidelines to assist them in addressing legal, ethical, and professional matters they may encounter at work. The code includes following laws, regulations, and policies and acting in a manner consistent with the mission and core values of Holy Cross Health and Trinity Health.

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**Reporting**

Instances may occur when colleagues or others know of or suspect improper conduct. They may also find themselves in situations in which they do not know how to respond. Holy Cross Health and Trinity Health recommend a four-step

process. If one of the steps is impractical or does not resolve the problem, any of the parties within the four-step process may be contacted.

The four-step process includes contacting:

- One’s immediate supervisor or a higher level manager
- The Holy Cross Health integrity and compliance officer
- Human Resources
- The toll-free, 24-hour Integrity ALERTLINE®(1-866-477-4661) or submit a report to [www.mycompliancereport.com](http://www.mycompliancereport.com) (access code: THO) for assistance from the Trinity Health organizational integrity staff.

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**Penalties**

Holy Cross Health has a strict policy against retaliation for persons reporting suspected violations in good faith.

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**Policy violations**

Colleagues who fail to follow this policy may experience corrective action, including termination, and may be subject to legal action.

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**Resources**

See Attachments for the 2024 Code of Conduct in English and Spanish.

Integrity and compliance education is available on Healthstream.

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**Questions and more information**

Contact the Integrity and Compliance Department with questions or for more information about this policy.

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TRINITY HEALTH  
Code of Conduct



TRINITY HEALTH CODE OF CONDUCT

Supplement for Medical Staff



## Code of Conduct – Supplement for Medical Staff

As a member of Trinity Health hospital medical staff, you are 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 delivering people-centered care that furthers healthcare quality, safety, provides positive patient outcomes, and effectively manages costs for our patients, residents, members, and communities we serve.

Trinity Health has established a system-wide Integrity and Compliance Program to support each of us in understanding and following applicable laws, regulations, professional standards, and ethical commitments. The Trinity Health Code of Conduct describes behaviors and actions expected of all Trinity Health colleagues, physicians, suppliers, board members, and others who partner with us. This Supplement highlights Code of Conduct standards that are important 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 your Ministry's Integrity & Compliance Officer. 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:

### 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, gender identity, 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.
- Always demonstrate the highest levels of ethical and professional conduct.
- 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 and take steps to prevent future mistakes.
- Adhere to clinical guidelines and protocols that reflect evidence-based medicine.
- Actively engage and support efforts to improve patient safety and 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 the treatment, procedure and/or outcomes differ significantly from what was expected.
- 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*.

## **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, accreditation, and certification 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](http://www.mycompliancereport.com) using access code "THO"

## Thank You!

We appreciate your review of this information and your partnership in our commitment to carrying out our Mission with the highest standards of ethical behavior. Your dedication and support are critical to this important effort.