



# CODE OF CONDUCT

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### **THIS CODE OF CONDUCT HAS BEEN ADOPTED BY EL PASO CHILDRENS HOSPITAL**

The Code of Conduct applies to all Employees of El Paso Children's Hospital (EPCH), Contractors, Medical Staff, Agents, and Board of Directors.

The code applies to everyone that has a business relationship with EPCH.

The Code of Conduct addresses conduct that is not acceptable at EPCH.

It is your job to report an incident if you feel the code has been violated.

We will not allow retaliation against anyone for good faith reporting.

Adopted 2/5/2012



Dear El Paso Children's Hospital Team Member:

Welcome to the most compassionate and dedicated group of individuals you will ever work with again in your careers. Thank you for choosing to be a committed member of this team and upholding the vision and mission of El Paso Children's Hospital.

El Paso Children's Hospital's **Vision** is to enhance the lives of children from the greater El Paso area and surrounding region, by providing a place of hope and healing through unmatched excellence in pediatric patient care, research, and education. Our **Mission** is to provide compassionate, coordinated, family-centered care for children with a dedicated commitment to excellent patient outcomes, inclusive leadership, and innovative pediatric research and education. Clearly with a lofty vision and mission we are expecting the best in quality and service from our team members, our physicians, our leadership, and our board of directors.

The following code of conduct is meant as a set of guidelines to ensure that high quality and service occurs. Our expectation is that our patients receive the best care possible *every time...every day*; that our Employees treat our families and visitors, with respect and compassion, *every time...every day*; that our leaders make decisions that are in the best interest of the children, *every time...every day*; and that our board expects the best from its leadership, its staff, and its physicians, *every time...every day*. As an organization we are also realistic enough to know that *every time...every day*, may not be a possibility, but it is a goal and an objective. It is imperative that as a team member of El Paso Children's Hospital, that you are keenly aware of what is happening around you at every moment. Our expectation is that you are an advocate for our patients and families constantly, and are vigilant in your daily work to make sure our mission and our vision are consistently upheld.

I urge you to review our Code of Conduct thoroughly and understand it to the best of your abilities. If at any point in time, anything strikes you as unusual or inconsistent with this Code of Conduct you are encouraged to speak with your department head or supervisor as soon as possible. You are also encouraged to reach out to any member of the leadership or management team or with Human Resources. If you are uncomfortable with utilizing any of these resources, please do not hesitate to contact our compliance hotline, which is always available at: **1.800.436.6184**

Thank you for joining our team and committing your talents to providing the best service and highest quality of care to the children that seek services from El Paso Children's Hospital. ***Welcome aboard!***

## **THIS CODE OF CONDUCT HAS BEEN ADOPTED BY EL PASO CHILDREN'S HOSPITAL**

- The Code of Conduct applies to all Employees of EPCH, Contractors, Medical Staff, Agents, and Board of Directors.
- The code applies to everyone that has a business relationship with EPCH.
- The Code of Conduct addresses conduct that is not acceptable at EPCH.
- It is your job to report an incident if you feel the code has been violated.
- We will not allow retaliation against any employee for good faith reporting.

### **Vision:**

To enhance the lives of children from the greater El Paso area and surrounding region, by providing a place of hope and healing through unmatched excellence in pediatric patient care, research and education.

### **Mission:**

To provide compassionate, coordinated family-friendly care for children with a dedicated commitment to excellent patient outcomes, inclusive leadership, and innovative pediatric research and education.

### **Core Values:**

These core values reflect our passion for quality care and how we serve patients, families, employees, and our community.

#### **HEALING ENVIRONMENT:**

We create a unique and nurturing environment by fostering teamwork and shared decision making through the practice of family centered care, including age appropriate comfort measures.

#### **EXCELLENCE:**

We strive for excellence in quality, service, and leadership. We continuously learn and work to improve our skills, programs, and services.

#### **ACCOUNTABILITY:**

We are accountable to fulfill our mission of serving children and their families. Every role makes a difference.

#### **RESPECT & DIGNITY:**

We honor and value the individuality, diversity, and contributions of our patients, families, and each other.

#### **TRANSPARENCY:**

We communicate by sharing and receiving information that is timely, instructive, and empowering.

### **Guiding Principles:**

- Be the pediatric hospital of choice for children and their families, physicians, and staff.
- Develop community and regional recognition for excellence in clinical care, pediatric research and education of future pediatric specialists and staff.
- Achieve distinctive market position through demonstrated quality/outcomes management, innovative services, outstanding customer service, dedicated facilities and essential community relationships.
- Develop facilities that will meet changing future requirements.
- Invest community resources wisely to maximize the care for children while insuring the operational sustainability.

# COMMITMENT FROM LEADERSHIP

**We will begin to address areas that are important in following the Code of Conduct by making the following commitments:**

- We are committed to providing high quality care and skilled, compassionate, reliable service to our **patients and to our community** in a safe and healing environment.
- We are committed to protecting each **patient's right to privacy** in accordance with the applicable laws and regulations and the privacy of all of our Employees.
- We are committed to treating all patients and their family members with warmth, and respect and dignity while providing necessary, appropriate, high quality, and affordable care in a manner that **protects the privacy of our patients and the confidentiality** of their health information.
- We recognize that the greatest strength of our organization lies in the efforts and talents of our Employees. We are committed to treating each other with **respect, dignity and courtesy**.
- We will follow all applicable **laws and regulations**, conduct our business ethically and honestly, and act in a manner that improves EPCH's standing in the community.
- We will ensure that **documentation, charging, coding and billing** functions are performed accurately. We will also ensure that there is documentation to support the services performed and the amounts charged. Communication among EPCH clinicians, coders, billers, and claims staff is necessary to ensure accurate and correct information, billing and reimbursement.
- We will avoid **business relationships** and actions that could interfere with or be perceived to interfere with our business or clinical decisions.
- We will protect the **property, equipment** and other resources of EPCH against loss, theft or misuse.
- We will consider **the safety and security** of patients, visitors and Employees in all of our activities.

# ETHICAL DECISION MAKING

Making good decisions is essential to the success of our organization. Every day we all make decisions for the organization. We may not realize it at the time, but decisions impact our reputation and standing in the community and our relationships with business associates.

Always consider these questions when you make a decision for the organization:

1. **Is it legal?**
2. **Is it consistent with company policy?**
3. **Is it consistent with our company's values?**
4. **Would I be comfortable if it were made public?**

If you answer **yes to all** of these questions, you are following the Code of Conduct and making good decisions for the organization.

If you see or become aware of conduct that appears **unethical or illegal**, it is your responsibility to report the behavior or situation.

## **Who should you contact?**

Supervisor / Manager / Director  
or  
Human Resources  
or  
Compliance Office / Anonymous Hotline

# **PATIENTS**

## **Patient Rights**

We make no distinction in the admission, transfer or discharge of patients or in the care we provide based on race, religion, age, gender, national origin, sexual orientation, disability or veteran status. Our patients may have diverse backgrounds and cultures therefore, we make every effort to educate and train our caregivers to respect and provide for our patients' particular needs. EPCH respects the patient's right to and need for effective communication. We will respect the dignity, comfort, and privacy of each patient and will treat each with all with consideration, courtesy and respect.

Each patient is provided documents that include the right of a patient to make decisions regarding medical care, the right to refuse or accept treatment, the right to informed decision-making, and the rights related to patient health information maintained by the facility.

Patients have the right to request transfer to another facility. In such cases, we will give the patient an explanation of the benefits, risks, and alternatives.

We understand that everyone needs to plan for healthcare in the future. We will inform patients of their right to make advance directives. These are the documents used to help a person express his or her wishes about medical care in case the person cannot speak for him or herself in the future. We will honor patient advance directives according to all applicable laws.

Each patient can expect to receive appropriate protection involving confidentiality, privacy, and security or protective measures. Appropriate pastoral or spiritual care will be provided. We provide the opportunity for resolution of complaints from patients and their families.

## **Emergency Treatment**

We will follow the Emergency Medical Treatment and Active Labor Act ("EMTALA") in providing emergency medical treatment to all patients, regardless of their ability to pay. Provided we have the capacity and capability, anyone with an emergency medical condition is treated and admitted based on medical necessity. In an emergency situation or if the patient is in labor, financial and demographic information will be obtained only after an appropriate medical screening examination and necessary stabilizing treatment (including treatment for an unborn child). We do not admit, discharge or transfer patients based simply on their ability or inability to pay. Patients will be transferred from EPCH only in accordance with the Hospital Transfer Policy or as otherwise allowed by law.

# **CONFIDENTIALITY OF PATIENT INFORMATION**

## **Use and Disclosure of Information**

- We collect information about the patient's medical condition, history, medication, and family illnesses to provide quality care.
- We will take reasonable precautions to ensure the confidentiality of patient information.
- We will only release information to third parties if the individual has consented or if permitted by law.
- We will follow the appropriate procedures for obtaining patient consent when using the patient's information for research purposes.
- We will not discuss or review confidential patient information in public areas.
- No Employee, affiliated physician, or other healthcare partner has a right to any patient information other than that necessary to perform his or her job.

## **Protection of Information Stored and Transmitted via Computer Systems**

- We will ensure proper security of the information stored and transmitted on our computer systems.
- We will limit access to information to those Employees who need it to perform their jobs.
- We will implement systems to monitor inappropriate access to information stored on our computer systems.
- We will ensure that Employees and providers are informed about our confidentiality and data security policies and guidelines.
- We will report confidentiality violations to those who can properly assess and resolve the issues. We will follow the appropriate disciplinary action when a violation occurs.

# **EMPLOYEES**

## **Quality of Care and Improvement Reporting**

- We promote quality improvement activities throughout the hospital to ensure that high quality care is delivered.
- We will work as a team to meet the physical, psychosocial and cultural needs of our patients.
- We will protect the integrity of clinical decision-making without regard to financial matters.
- We will provide patients and family members with the information they need to make knowledgeable decisions.
- We will treat patients in a manner that preserves their dignity, autonomy, self-esteem and civil rights, and that promotes involvement in their own care.
- We will inform patients / family members about El Paso Children's Hospital's charges and services.
- We expect all Employees to maintain integrity and quality in their job performance.

## **Standards of Care**

- We will provide patient care that meets or exceeds acceptable clinical, patient care and safety standards.
- We will maintain complete records of patient information to ensure continuity of care and to meet the requirements stated in policies, regulatory standards and applicable laws and regulations.
- We will monitor the quality of care provided to ensure that clinical standards are being met and policies and procedures are being followed.
- We expect all Employees to report problems (deficiencies or errors) to those who can properly assess and resolve the issues.

# **RELATIONSHIPS WITH OUR HEALTHCARE PARTNERS**

## **Affiliated Physicians**

- The Medical Staff includes physicians who are employed or affiliated with Texas Tech University Health Sciences Center ("TTUHSC") as well as community physicians. We encourage our Medical Staff to continue respectful and supportive interaction with our workforce in a manner that follows the Code of Conduct. There are many aspects of this Code of Conduct that pertain to ethical or legal obligations of physicians in hospitals. An expectation to abide by the ethical guide for physicians, i.e. Hippocratic Oath, is inherent in the medical profession. All physicians practicing in this institution will prescribe regimen for the good of the patients according to one's professional ability and judgment and never do harm to anyone.
- There are two Federal and State laws that are of particular interest to hospitals doing business with physicians: The Stark Law and the Anti-Kickback Statute. In order to satisfy ethical and legal standards regarding referrals and admissions, these laws are summarized below:
  1. We will not pay for referrals. We will accept patient referrals and admissions based solely on the patient's clinical needs and our ability to render the needed services. We will not pay or offer to pay anyone -- colleagues, physicians, or other persons -- for referral of patients. Violation of this policy may have grave consequences for the organization and the individuals involved, including civil and criminal penalties, and possible exclusion from participation in federally funded healthcare programs.
  2. We will not accept payments for referrals we make. No El Paso Children's Hospital Employee or any other person acting on behalf of the organization is permitted to solicit or receive anything of value, directly or indirectly, in exchange for the referral of patients. Similarly, when making patient referrals to another healthcare provider, we will not take into account the volume or value of referrals that the provider has made (or may make) to us.
- El Paso Children's Hospital evaluates all physician and referral source contracts for fair market value prior to performance of services under the contract. Along those same lines, proper documentation is required prior to payment for physician services.

## **Business Partner Agreements**

- We expect our business partners to maintain strong confidentiality protections and limit the use of the information we provide them as prescribed by law and regulation.
- We ask our business partners to comply with our confidentiality agreement during and after the partnership.

- We protect the confidentiality of the information provided to us by our business partners to the extent permitted by law.

## **Business Associates**

- El Paso Children’s Hospital has many business associates. In the normal course of providing quality care for our patients, it is necessary to share our patients' protected health information with some of our business Associates. As discussed in the Confidentiality section below, EPCH will enter into Business Associate Agreements and expects our business Associates to protect our patient's protected health information in compliance with the HIPAA Privacy Regulations and all other applicable laws, rules, and regulations.

## **Information Security Confidentiality Agreements**

- All El Paso Children’s Hospital Employees, Contractors, Medical Staff, Residents, Allied Health Professionals (AHP’s), referring and other Physicians, Volunteers, working on EPCH premises or accessing the information systems remotely via a virtual private network (VPN) connection who are accessing EPCH sensitive and/or patient information must sign a Confidentiality Agreement prior to any access being granted.

# **RELATIONSHIP WITH MEMBERS OF THE WORKFORCE / VENDORS**

## **Hospital Leader Conflicts of Interest**

- El Paso Children's Hospital has a fiduciary and ethical responsibility to local taxpayers to maintain an environment of transparency. One of the ways this duty is fulfilled is by ensuring financial conflicts of interest are handled appropriately.
- El Paso Children's Hospital has an annual disclosure process that is designed to identify and address potential, actual, and apparent Conflicts of Interest with El Paso Children's Hospital leaders and vendors or others who may do business with El Paso Children's Hospital

## **Gifts, Gratuities, Favors, Discounts**

- El Paso Children's Hospital leaders shall not accept anything with a retail value exceeding \$50.00, including donation of goods or services, from any supplier, vendor or organization doing or seeking to do business with EPCH.
- Our Employees do not solicit, obtain, or retain any item or service of personal benefit from a vendor, patient, or any organization doing or seeking business with El Paso Children's Hospital that could influence or be perceived to influence the Associate's performance or decision making.
- Our Employees do not accept cash gifts of any amount from a supplier, vendor, patient, or any organization doing or seeking business with El Paso Children's Hospital.

## **Contracting Process**

- We will strictly adhere to the rules established by El Paso Children's Hospital for the procurement of supply items and services.
- The procurement activities of El Paso Children's Hospital are to be conducted with integrity and in a professional manner that complies with the spirit and intent of the mission El Paso Children's Hospital, with the principles of sound business practice, with all applicable laws and regulations.

## **Research Activities**

- We will ensure that all research activities are approved through the Institutional Review Board (IRB) process and that all investigators have formally completed the investigator training prior to commencement of any study at El Paso Children's Hospital.
- We will audit the accounts of all research study patients to ensure proper billing practices.

## **LEGAL AND REGULATORY AUTHORITY**

- We are committed to an environment in which compliance with rules, regulations, and sound business practices is woven into the corporate culture. We accept the responsibility to aggressively self-govern and monitor adherence to the requirements of law and to our Code of Conduct.
- El Paso Children’s Hospital provides varied healthcare services in the state of Texas. The services are provided pursuant to applicable federal, state, and local government laws. The laws and regulations may include, but are not limited to, licenses, permits, accreditation, access to treatment, consent to treatment, medical record keeping, and access to medical records, confidentiality, patient rights, clinical research, advance directives, medical staff credentialing, and Centers for Medicare and Medicaid Services (CMS) program requirements. There is a range of expertise within the organization that can be consulted for advice concerning legal, regulatory, and human resources requirements.
- We will issue and maintain financial and cost reports, accounting records, research reports, expense accounts, time sheets and other documents that accurately and clearly reflect El Paso Children’s Hospital’s transactions and financial performance.
- Anyone aware of conduct that appears illegal should report the behavior or situation to their supervisor or manager, department director, Human Resources, the Compliance Officer, or the Anonymous Hotline.
- All Employees, Contractors, Medical Staff, or Agents of EL Paso Children’s Hospital are expected to be familiar with and comply with federal and state laws, including laws specific to healthcare fraud.
- Willful non-compliance will expose Employees to disciplinary action up to and including termination. In the case of criminal behavior, we will notify the proper authorities.

## **REIMBURSEMENT FOR SERVICES PERFORMED (Charges, Coding, Documentation, and Billing)**

- We will ensure that documentation, charging, coding and billing are performed accurately. We will also ensure that there is documentation to support the services performed and the amounts billed. Communication among clinicians, coders and billers is necessary to ensure accurate and correct information, billing and reimbursement.
- We are committed to dealing with our third party payers in a way that demonstrates our commitment to contractual obligations and reflects our shared concern for quality healthcare and bringing efficiency and cost effectiveness to healthcare. We will take great care to assure all billings to government payers, commercial insurance payers and patients are true and accurate and conform to all pertinent federal and state laws and regulations. We will not tolerate any Employee or agent of El Paso Children's Hospital knowingly presenting or causing to be presented claims for payment or approval that are false, fictitious, or fraudulent.
- We are committed to following the practices outlined in the CMS provider manuals to ensure both accurate billing and submission of claims only for services that are actually rendered and medically necessary.
- We will maintain an accurate and updated charge master following correct coding and billing requirements for CMS and other third-party payors.
- We will maintain appropriate documentation to support coding and billing. We will bill for services according to the medical necessity guidelines provided by the various payers. We will only bill for eligible services that are rendered and documented.
- We will promptly investigate and correct problems if errors in claims or billings are found. We will identify errors, report them to our managers or the appropriate individual, and correct them in a timely and appropriate manner.
- We will document all services that are performed and we will not bill for services that are not documented appropriately.
- Our coders will have proper credentials and education in order to perform the duties of coding for services performed in El Paso Children's Hospital.

## **GOVERNMENT RELATIONS AND POLITICAL ACTIVITIES**

- El Paso Children’s Hospital. does not make contributions to candidates for any elective office, or to any political organization. Furthermore, you, as an employee, may not make contributions, whether in cash or otherwise, on behalf of the Hospital.
- All Employees are encouraged, but not required, to support the legislative process through personal contributions or by volunteering their personal time to the candidate or organization of their choice.
- With respect to an employee holding public office, whether elective or appointive, the potential for conflict or interest, or the appearance of a conflict, must be seriously considered.
- If you have any questions regarding political activities, please contact the El Paso Children’s Hospital. Legal Department or Management.

## **ACCREDITATION AND SURVEYS**

El Paso Children’s Hospital will deal with all accrediting bodies in a direct, open and honest manner. We will not take any action in relationships with accrediting bodies that would mislead the accreditor or its survey teams, either directly or indirectly.

We are committed to being in full compliance with the standards established by The Joint Commission (TJC). To that end, this Code addresses our marketing, admission, transfer and discharge policies, as well as billing practices. The Code also addresses the relationship of the hospital and its Employees to other healthcare providers, educational institutions and payers. Furthermore this Code emphasizes our policy to preserve and protect the integrity of clinical decision making regardless of how the hospital compensates or shares the financial risk with its leaders, managers, clinical staff, and licensed independent practitioners

The mission of The Joint Commission (TJC) is to continuously improve the safety and quality of care provided to the public through the provision of healthcare accreditation and related services that support performance improvement in healthcare organizations.

TJC evaluates the quality and safety of care for more than 15,000 U.S. healthcare organizations, to include El Paso Children’s Hospital. We intend to maintain this accreditation on an annual basis.

# **EPCH ENVIRONMENT**

## **Protection of Property and Assets**

- We will protect the property, equipment and other resources of El Paso Children’s Hospital against loss, theft or misuse.
- We will use El Paso Children’s Hospital's funds to purchase property, equipment, supplies and other assets that will help us to achieve our mission of providing high quality, low-cost healthcare.
- We will dispose of property that is no longer used or needed in accordance with our asset retirement procedures. The practice of selling, trading, transferring or scrapping of property without the appropriate approval is considered a misuse of assets.
- We accept responsibility for the safeguarding of El Paso Children’s Hospital's property, equipment, supplies, services and other assets. We will maintain internal controls within our areas of responsibility to ensure that these items are protected from theft or misuse.
- We will not install, share, or copy software programs or perform any other acts that would be in violation of the vendor's software license agreements.
- We proactively protect our assets against theft through processes and procedures that provide for deterrence, detection, prevention, and prosecution of theft.
- El Paso Children’s Hospital has a comprehensive records management process. All Employees must follow the rules established by El Paso Children’s Hospital for the creation, maintenance, retention, and disposal of our records. El Paso Children’s Hospital may not destroy medical records that relate to any matter that is involved in litigation if the hospital knows the litigation has not been finally resolved.

## **Safe and Healthy Work Environment**

- El Paso Children’s Hospital is committed to provide a healthy and smoke free atmosphere for its employees, patients, visitors, etc. Smoking on our campus is strictly prohibited and will not be tolerated.
- El Paso Children’s Hospital employs qualified, reliable, honest, trustworthy and non-violent individuals. Prior to extending any offers for employment or business relationships, background screening must be performed and in accordance with our rules for disqualifying offenses under El Paso Children’s Hospital policy.
- El Paso Children’s Hospital is committed to providing an environment that is free from alcohol and illegal drugs, and to taking reasonable measures to ensure that alcohol and drug use does not jeopardize the safety and health of our patients, visitors, Employees, contract personnel, volunteers, affiliated students or the public.

## **Workplace Conduct**

- We recognize that the greatest strength of our organization lies in the efforts and talents of our Employees. We are committed to treating each other with respect, dignity and courtesy.
- We will provide equal employment and advancement opportunities to all applicants and Employees.
- We will not discriminate in any of our employment practices on the basis of race, color, religion, gender, age, national origin, disability or veteran status.
- We will not tolerate any type of unlawful workplace harassment.
- Violent act or threats of violence are strictly prohibited by El Paso Children's Hospital Employees. We model a ZERO tolerance for workplace violence.
- Committing or allowing retaliation for good faith reporting of a perceived or suspected Code of Conduct violation, or for participation in an investigation of an alleged violation, will not be tolerated.
- We will set high standards of performance and conduct and hold Employees accountable for their actions.
- Do not misuse El Paso Children's Hospital equipment or property and take all necessary precautions to safeguard it.
- Do not use your position as an Employee to support political appointees or candidates for office or to receive a benefit.
- Promptly report any illegal activities or violations of El Paso Children's Hospital policies or the Code of Conduct to the appropriate entity.

## **Marketing Practices**

- El Paso Children’s Hospital may use marketing and advertising activities to educate the public, provide information to the community, increase awareness of our services, and to recruit colleagues. We will present only truthful, fully informative, and non-deceptive information in these materials and announcements.
- In preparation of bids and proposals related to marketing of the EPCH services to external customers, EPCH Employees are expected to disclose all current, accurate and complete pricing data based upon known facts in instances where facts exist, or upon sincere and honest judgment of the absence of facts, It is never acceptable to underestimate cost or overstate benefits in order to obtain business contracts, Finally, in the performance of a contract, it is EPCH policy that care be taken to prevent any non-approved deviation from the written contract specifications, and that all products or services meet written contractual agreements.
- We strive to fairly and accurately represent EPCH and its capabilities, avoiding false and misleading, advertising and rejecting high pressure manipulation, or misleading marketing or sales tactics. It is Hospital policy that all marketing materials will reflect services and products available, the current level of licensure and accreditation, and compliance with applicable laws and regulation in advertising and non-discrimination. All verbal and written communications shall be true, fair and accurate.
- A momentary advantage gained through even slight misrepresentation or exaggeration can compromise and endanger the future success of EPCH.

## **Procurement of Goods and Services**

- When considering the purchase of a product or services El Paso Children’s Hospital will follow EPCH’s established procurement processes.
- El Paso Children’s Hospital recognizes that obtaining bids and prices quotes may not always be practical: for example, a vendor (or physician) may be a sole source provider if services provided are so unique or specialized that such services are not readily available from another source. Outside of the extenuating circumstances listed above, bids and quotes should follow the approved EPCH procurement process.

# **Compliance Program**

## **Code of Conduct Purpose**

El Paso Children's Hospital has implemented a formal Compliance Program designed to prevent and detect violations of federal or State law in the conduct of the Hospital operations by Associate, physicians and agents. The effectiveness of the EPCH Compliance Program depends on each Employees willingness to bring issues to the attention of his or her supervisor or EPCH Compliance Officer. All actual or suspected compliance issues must be reported.

### **Key Responsibilities for All Employees**

- Seek advice from your supervisor, manager, Human Resources or the Compliance Office if you have any questions regarding your responsibilities related to your job or this Code of Conduct.
- Display high ethical standards in all your clinical and business decisions.
- Represent the organization in a fair and honest manner.
- Do not misuse El Paso Children's Hospital equipment or property and take all necessary precautions to safeguard it.
- Do not use your position as an Employee to support political appointees or candidates for office or to receive a benefit.
- Do not use the organization's funds for improper or illegal activities.
- Promote open lines of communication between clinicians, coders and billers to maintain correct billing and reimbursement for services provided.
- Do not conduct personal business while on the premises.
- Maintain a safe and healthy work environment.
- Do not accept cash or gifts from vendors.
- Take care to ensure the confidentiality of patient and associate information.
- Follow the Code of Conduct and all policies and procedures.
- Follow federal, state, and local laws.
- Promptly report any illegal activities or violations of El Paso Children's Hospital policies or Code of Conduct to the appropriate entity.

## **Elements of the Compliance Program**

- We have established compliance standards and procedures to be followed by Employees and Agents of El Paso Children's Hospital
- The Compliance Officer of El Paso Children's Hospital oversees all compliance activities
- We ensure that background checks are performed on all Employees and agents of the El Paso Children's Hospital and ensure that our healthcare providers have not been sanctioned by a federal payer.
- We educate and train our Employees on Compliance policies and procedures on an annual basis and as needed throughout the year.
- We have various monitoring and auditing programs in place to achieve compliance with standards under guidelines established by the federal government for effective compliance programs.
- Sometimes an investigation indicates a deficiency in a hospital process. Compliance strives to improve the process and prevent further similar deficiencies.

We encourage good faith reporting and understand that there are times when you may want to be anonymous. The Compliance Anonymous Hotline is available 24-hours-a-day, seven-days-a-week for phone calls.

## **Compliance Hotline**

**1-855-299-9134**

Please consider the questions listed below when deciding whether to report a potential violation of the Code of Conduct.

- Do I have a reasonable understanding of the facts available to me?
- Do I believe the action is in violation of the standards as outlined in the Code of Conduct?
- Do I believe the action is in violation of any known law, rule, regulation, policy or procedure?

### **Compliance Investigation and Resolution**

The Compliance Office will ensure the prompt and thorough investigation of all suspected violations and will coordinate appropriate follow-up action and resolution as indicated.

All investigations will be conducted following established procedures for confidentiality.

### **Statement of Non-Retaliation**

We feel very strongly about protecting your rights as an Employee reporting a potential violation of the Code of Conduct.

If we discover that you are being retaliated against for bringing a suspected violation to our attention or for participating in an investigation, we will take action as per hospital policy.

Any Employee who commits or allows any form of retaliation may be subject to disciplinary action, up to, and including termination.

If you suspect healthcare fraud is occurring and feel that the Compliance Hotline investigation is not satisfactory, or you do not feel comfortable with reporting the allegation through any internal method; you have the right to contact the Office of the Inspector General (OIG).

#### **Examples of Health Care Fraud include:**

- Billing for services not rendered or goods not provided
- Falsifying certificates of medical necessity and billing for services not medically necessary
- Billing separately for services that should be a single service
- Falsifying treatment plans or medical records to maximize payments.
- Failing to report overpayments or credit balances
- Duplicate billing
- Unlawfully giving healthcare providers, such as physicians, inducements in exchange for referrals for service.
- Physician billing for services provided by interns, residents, and fellows in a teaching hospital.

**Process to Notify the Federal or State Government Regarding Reporting Fraudulent Activity:**

**OIG Hotline Reporting**

**1-800-436-6184**

**[www.hhs.state.tx.us/OIG](http://www.hhs.state.tx.us/OIG)**

**Strengthening Our Culture**

I \_\_\_\_\_  
PRINT NAME

Have received El Paso Children’s Hospital Code of Conduct and understand that I must read and agree to comply with the standards set forth.

\_\_\_\_\_  
SIGNATURE

\_\_\_\_\_  
EMPLOYEE ID NUMBER

\_\_\_\_\_  
DATE

**Adopted: 2/5/2012**