



Code of Conduct and Ethics





Erlanger Health System Code of Conduct and Ethics

Erlanger Health System (EHS) is a nationally-acclaimed, multi-hospital health system anchored by a leading academic medical center. Each year, more than 600,000 people are treated by the team of healthcare professionals who are part of Erlanger. This Code of Conduct and Ethics is a critical piece of our overall Compliance Program. It is developed to ensure EHS colleagues meet our ethical standards and comply with laws, regulations, and EHS policies.

Our Mission

We compassionately care for people.

Our Vision

Erlanger is a nationally-acclaimed health system anchored by a leading academic medical center. As such we will deliver the highest quality, to diverse populations, at the lowest cost, through personalized patient experiences across all patient access points. Through innovation and growth, we will sustain our success and spark economic development across the Chattanooga region.

Our Core Values

Excellence: We distinguish ourselves and the services we provide by our commitment to excellence, demonstrating our results in measurable ways.

Respect: We pay attention to others, listening carefully, and responding in ways that demonstrate our understanding and concern.

Leadership: We differentiate ourselves by our actions, earning respect from those we lead through innovation and performance.

Accountability: We are responsible for our words and our actions. We strive to fulfill all of our promises and to meet the expectations of those who trust us for their care.

Nurturing: We encourage growth and development for our staff, students, faculty and everyone we serve.

Generosity: We are giving people. We give our time, talent and resources to benefit others.

Ethics: We earn the trust by holding ourselves to the highest standards of integrity and professional conduct.

Recognition: We value achievement and acknowledge and celebrate the accomplishments of our team and recognize the contributions of those who support our mission.

Dear Erlanger Health System colleagues,

Erlanger is honored to be a trusted resource for our community. In the ever changing healthcare environment, we continue to strive for innovation and excellence as **we compassionately care for people.**

Our Code of Conduct is a guide to help each of you operationalize Erlanger's Core Values. These Core Values are not just a list posted on our website, but instead reflect the attributes that all EHS colleagues have a duty to embody. Erlanger's Core Values are intrinsically tied to what influences EHS's success. To ensure our commitment to our Core Values, we document them in our Code of Conduct, share them with all EHS colleagues, and strive to weave them into our daily actions.

How should each of you operationalize our Core Values?

- Hold yourself and others accountable
- Ask questions when you are unsure
- Maintain open and honest dialogue
- Treat everyone with respect
- Make ethical decisions
- Vocalize concerns by reporting through eSafe and/or the Erlanger Integrity Line

We cannot stop at just operationalizing our Core Values. We must strive to ensure our patients and visitors (our customers) are left with a feeling of pride. Our Community is an integral part of our success. We must take time to understand our region, the challenges it faces, and how we can better meet the healthcare needs of the communities we serve. **We're in this together.**

EHS is dedicated to providing the highest quality care to our community. This begins with our one-of-a-kind employees and their commitment to excellence.

Everyday each of you should strive to uphold the core values of **E-R-L-A-N-G-E-R.**



No Code of Conduct can spell out the appropriate behavior for every situation. If you have questions regarding this Code of Conduct or encounter any situation which you believe violates EHS values or standards, please contact:

1. Your supervisor
2. The Compliance Office: **423-778-7703**
3. The Compliance Email: **Compliance@erlanger.org**
4. Or report anonymously through the Compliance Integrity Hotline online or by phone at **1-877-849-8338**.

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Our Code

Our code of conduct is a reflection of an organization's mission, vision, and core values. Our organizational culture is based on these core values and high ethical standards. Please use this as a resource guide for your daily functions. Erlanger's code answers ethical and behavioral questions by reflecting back to an organization's mission and core values.



Why should we follow our Code of Conduct?

Erlanger's Code of Conduct serves as a blueprint for EHS colleagues' daily responsibilities. Every EHS colleague should be an outstanding example of Erlanger's Core Values. All EHS colleagues are required to know and abide by the Erlanger Code of Conduct. The Erlanger Code of Conduct is a foundation of Erlanger Health System, it is the basis of our every action, and a road-map to the goal of our mission of **compassionately caring for people**. This Code of Conduct outlines the actions, character, and core values needed to retain Erlanger's status as a leader of excellence in healthcare within our community and the region.

What is my individual responsibility?

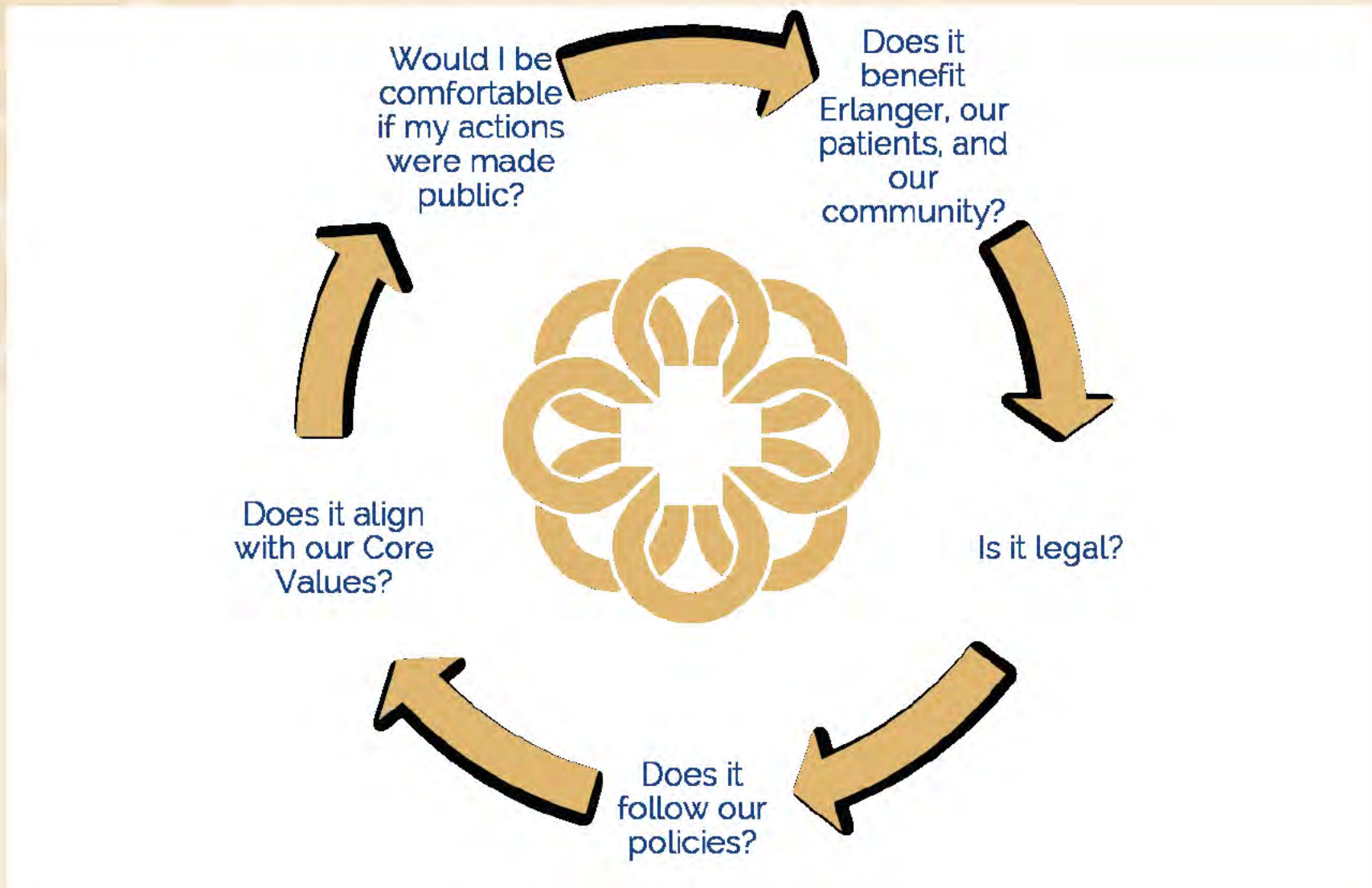
Knowing and abiding by the Code of Conduct means that you embody the core values and elements of the Code of Conduct daily. It is the responsibility of every EHS colleague to use the Code of Conduct as a guide to make the best decisions.

How to use our Code of Conduct:

- Read and understand the code
- Comply with the letter and the spirit of the code
- Seek guidance if you're unsure what to do
- Promptly report known or suspected violations
- Cooperate with internal investigations of reported violations



What if the decision is not clear?



If you cannot answer yes to all of the above questions, you should think about your decision. If you cannot find an answer within the Code of Conduct, please ask your supervisor or the Compliance Department for guidance.



Values of Excellence

We will:

- Recognize the right of our patients to receive quality services, and continually strive to improve the quality of the services we provide
- Provide a safe work environment for EHS colleagues
- Remain free from conflicts of interest and report any that might arise
- Strive to bring innovative healthcare to the community
- Act with integrity and make ethical decisions

We distinguish ourselves and the services we provide by our commitment to excellence, demonstrating our results in measurable ways.

Values of Respect

We will:

- Listen to our patients, families and visitors to understand any concerns or complaints
- Support every patient's right to be respected and free from all types of abuse
- Provide treatment and medical services without discrimination based on race, age, religion, national origin, gender identity, sexual orientation, or disability
- Value and respect workplace diversity
- Treat EHS colleagues with dignity and respect
- Protect EHS colleagues from a workplace that is offensive, hostile, or intimidating

We pay attention to others, listening carefully, and responding in ways that demonstrate our understanding and concern.





Values of Leadership

We will:

- Lead by example
- Recognize our position as a regional healthcare leader and value our obligations as a leader to all segments of our community
- Promote a culture of compliance and ethical behavior
- Provide guidance for employees you supervise
- Monitor code and policy compliance of employees you supervise
- Ensure those you supervise complete required training

We differentiate ourselves by our actions, earning respect from those we lead through innovation and performance.

Values of Accountability

We will:

- Treat all patients' and EHS colleagues' information with privacy and confidentiality
- Assess and review coding and billing practices regularly
- Ensure the accuracy of our cost reports
- Monitor the licensure and credentialing standards of all healthcare providers
- Continuously screen EHS colleagues against the OIG's List of Excluded Individuals and Entities

We are responsible for our words and our actions. We strive to fulfill all of our promises and to meet the expectations of those who trust us for their care.





Values of Nurturing

We will:

- Celebrate our patients' healing success
- Encourage personal growth both mentally and physically
- Support education and trainings to teach EHS colleagues about the impact of the law on their duties, to promote compliance with our collective obligations
- Encourage all employees to seek additional training and education to further their ability to provide the best care to patients

We encourage growth and development for our staff, students, faculty, and everyone we serve.

Values of Generosity

We will:

- Dedicate our full time and attention to furthering Erlanger's mission to compassionately care for people
- Consider the needs of our patients, visitors, and colleagues before our own, and use our talents to the best of our abilities to care for patients and their families
- Strive to understand the needs of our community and continuously search for ways to give back and respond to those needs

We are giving people. We give our time, talent,
and resources to benefit others.



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Values of Ethics

We will:

- Maintain confidentiality and privacy of EHS patients, colleagues, and EHS proprietary information
- Follow ethical standards in compliance with federal and state laws
- Strive to earn the trust of our patients and colleagues
- Not pay for referrals, or accept payment for referrals we make
- Not provide or bill for services which are not medically necessary
- Ensure accuracy of coding and billing for services

We earn trust by holding ourselves to the highest standards of integrity and professional conduct.

Values of Recognition

We will:

- Celebrate the successes of our patients, visitors, and colleagues
- Acknowledge and thank those in the community supporting Erlanger's mission to compassionately care for people
- Value the many, varied contributions made by EHS colleagues, and continue to recognize and celebrate diversity in our workforce

We value achievement and acknowledge and celebrate the accomplishments of our team and recognize the contributions of those who support our mission.



Representing Erlanger Health System

- We are individually responsible for our words and our actions. We believe Erlanger Health System stands as a pillar of the community and an example of excellence. As an EHS colleague, you help represent Erlanger. This means all EHS colleagues have a duty to uphold and promote a positive reputation for Erlanger Health System.
- EHS colleagues should promote Erlanger in a respectful and uplifting manner.
- EHS colleagues are not permitted to speak publicly on behalf of Erlanger without first speaking to Erlanger's Public Relations Department. Any time an EHS colleague is permitted to speak or be quoted on behalf of Erlanger there should be a member of the Public Relations Department present or prior approval of content.
- Unauthorized representations of Erlanger could harm our health system including legal and ethical violations, confidential information disclosures, false information announcements, and damage to our reputation.

Social Media and Erlanger

EHS colleagues are not permitted to use their Erlanger email address to register for ANY social media site. Use of Erlanger information including: email, name, logo, or proprietary information is not permitted without prior approval by the Marketing Department. When posting online please be mindful of posts regarding Erlanger and ensure any information or views are clearly your personal views and not attributed to EHS.



How to Build and Maintain a Culture of Compliance and Ethics

Integrity is the basis for everything we do. Specifically, when it comes to doing the right thing in the face of difficult situations. This means constantly assessing what we have done well and identifying areas for improvement to ensure patient trust. At the end of the day, integrity is what allows us to always strive to be the very best at **compassionately caring** for our patients.

Transparency ensures that all EHS colleagues are familiar with our processes, understand how decisions are made, and are kept up-to-date on the current state of the organization. Transparency allows EHS colleagues to align their work with goals and priorities.

Humility leads us to recognize that our imperfections drive us to do better. Recognizing our missteps along the way is how we continuously learn. EHS colleagues should humbly check egos at the door and recognize that everyone can learn from feedback and guidance.

Your Duty to Prevent

- Identify compliance risks and propose appropriate policies to address the risk
- Identify EHS colleagues whose activities pose compliance risks
- Provide additional education and counseling to assist EHS colleagues to understand the Code of Conduct and applicable laws

Your Duty to Detect

- Implement and maintain appropriate compliance monitoring protocols and utilize mechanisms that foster the effective reporting of potential issues
- Promote an environment that permits EHS colleagues to raise concerns without fear of retaliation
- Arrange periodic risk assessments with your department and report identified risks and concerns to the Compliance Department



Your Duty To Report

Speak with your supervisor.

Call the Erlanger Integrity Line **1-877-849-8338**

Report directly to the Compliance Department **423-778-7703**

Reporting compliance concerns allows us to take action and solve problems that will drive change within the organization. By reporting, you provide insight that allows us to recognize the issue we are working to overcome.

- Erlanger is committed to providing all EHS colleagues with a means of raising questions and concerns, and reporting any conduct that he or she suspects is in violation law or this Code of Conduct
- EHS colleagues are expected and required to communicate any suspected violations of the Code of Conduct to: a direct supervisor, the Chief Compliance Officer or the Chief Legal Officer
- If you prefer, you can anonymously call the Erlanger Integrity Line which is available 24/7: 1-877-849-8338
- EHS colleagues may also report anonymously online at: secure.ethicspoint.com

The Integrity Line

Every concern reported will be investigated and handled appropriately. Erlanger policy prohibits retaliation toward a person bringing a good faith allegation of noncompliance.

The Erlanger Integrity Line is a 24-hour, seven-day-a-week dedicated telephone line. Reports may be made anonymously. EHS colleagues who call the hotline will be assigned a unique report and personal identification number they may use to check the status of reports and inquire.

What should I report?

The following list, while not exhaustive, describes the type of concerns and questions that you should raise with your supervisor, Compliance Department, or through the Erlanger Integrity Line.

- The possible submission of false, inaccurate, or questionable claims to Medicare, Medicaid, or any other payer;
- The provision or acceptance of payments, discounts, or gifts in exchange for referrals of patients;
- The utilization of improper physician recruitment techniques;
- Situations that could raise conflicts of interest;
- Potential breaches of confidentiality or privacy; and
- Allegations of retaliation.

If you believe you've witnessed a violation of the Code of Conduct, Erlanger policy, or applicable federal or state law, inform your supervisor or the compliance department. You can never be too compliant!



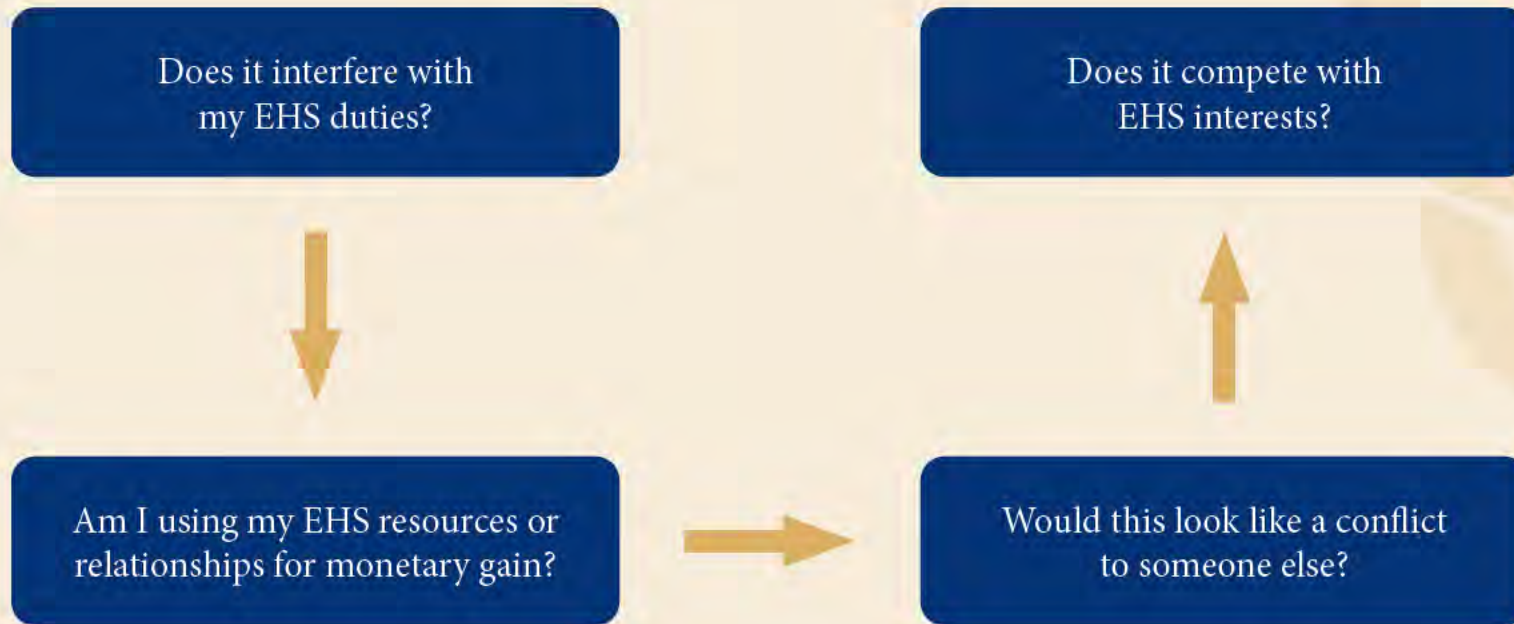
Promise of Non-Retaliation

Erlanger Health System will not tolerate retaliation in any form for compliance reports made in good faith. Erlanger Health System takes reports of retaliation seriously and will investigate thoroughly and recommend disciplinary action as necessary.

Employees will not face disciplinary action for reporting in good faith. If you or someone you know is or has been experiencing retaliation in any way, please report this issue to the Compliance Department.



Conflicts of Interest



Avoiding conflicts of interest:

Conflicts arise when you put your personal, social, or financial interests ahead of what is best for Erlanger and its patients.

- Your interests and relationships outside of work should not interfere with your job,
- You should not supervise family or friends,
- You should not use EHS information or resources for personal gain,
- You must disclose actual, potential, or perceived conflicts of interest to the Compliance Department

Erlanger Health System's Commitment to:

- Our patients: We will strive to provide the best care possible with the most up-to-date technology and competent staff. We will respect all patients and their right to be involved in their own care.
- The community we serve: We will give back to our community and provide top-notch healthcare to all community members regardless of status. We will be a guiding light in the community for excellence in healthcare, innovation, research, education, and generosity.
- Our EHS colleagues: We will create a safe working environment which fosters valuable relationships and nurtures education and growth. We will provide a workplace free from harm and retaliation for every EHS colleague.
- Our affiliated physicians: We are committed to fostering an environment of innovation and nurturing in order to provide a cutting-edge facility. We will provide a safe and inclusive environment with promotes personal and professional growth.
- Our volunteers: We will provide a respectful and welcoming environment for our volunteers. We understand volunteering is gift and not a requirement. We will treat our volunteers in a respectful and inviting manner, while acknowledging the need they fulfill for our patient's care.
- Our third-party payers: We will work to handle all obligations in an ethical way which is guided by our contractual agreements and our organizational mission.
- Our regulators: We are committed to a culture of compliance and ethical behavior. We will strive to make ethical decisions in all of our endeavors, and implement corrective actions as necessary.
- Our joint venture partners: We will fulfill our responsibilities to the best of our abilities while furthering our organizational mission.
- Our vendors: We will encourage fair competition and form relationships with suppliers who are able to best fulfill our needs in a manner consistent with our ethical obligations and our organizational mission.

Personal Commitment and Certification

I acknowledge and certify that I have received, read, and understand the Erlanger Code of Conduct and Ethics. I understand my obligations to comply with the Code of Conduct and Ethics.

I agree to comply with the Erlanger Code of Conduct and Ethics, all federal, state, and local laws, and rules and regulations for the duration of my association with Erlanger Health System.

Please sign here: _____

Date: _____

Please print your name: _____

Dept. _____

