



# **CODE OF CONDUCT**

**FOR**

*Frankford Hospital*

*July 2006*

# Frankford Hospital

The logo for Jefferson Health System, featuring a stylized 'J' inside a circle followed by the text 'Jefferson Health System' with a registered trademark symbol.

Dear Fellow Frankford Hospital Employee:

Frankford Hospital is committed to improving the quality of life in our community by providing comprehensive, cost-effective, state of the art health services to our patients. To fulfill this commitment, we strive to ensure that we provide quality healthcare in an ethical and legal manner. Our commitment to excellence and integrity means doing the best job we can in the *right* way.

The Frankford Hospital Code of Conduct, "*Do the Right Thing*," provides guidance to ensure that we conduct ourselves ethically and honestly at all times. It emphasizes the shared values that guide our actions. It directs us to resources we can use to help resolve any questions regarding appropriate conduct in the work place. Please review it thoroughly. We are counting on you to commit to its spirit, as well as to its specific provisions.

If you have questions regarding this Code or encounter any situation that you believe violates its provisions, you should immediately consult your supervisor, the Compliance Office or by using our toll-free *ComplyLine* (1-888-5COMPLY) . *ComplyLine* is available 24 hours a day, seven days a week. As long as you report your concerns honestly, our Compliance Program protects you from being reprimanded or disciplined for raising concerns about the Code or for reporting possible improper conduct.

Our Code of Conduct was designed to be consistent with the principles set forth in our Mission Statement and reflects our commitment to assuring that our actions consistently reflect our words. In this spirit, we expect all members of Frankford Hospital to adhere, without exception, to the standards set forth herein.

No code of conduct can substitute for common sense, individual judgment or personal integrity or can cover every situation encountered in our daily conduct. Thus, if you encounter a situation or are considering a course of action that may be technically within the guidelines of the Code of Conduct, but you feel a sense of uneasiness regarding the contemplated action, please do not hesitate to discuss the situation with your supervisor, with the Compliance Office or through *ComplyLine*.

As a valuable member of our healthcare team, we ask you to assist us and all of our Frankford Hospital colleagues in supporting the values embodied in the Code of Conduct.

Sincerely,

**John C. Mitkus**  
Chairman of the Board of Directors

**Roy A. Powell**  
President and CEO

# *Frankford Hospital's* **Do The Right THING** **CODE OF CONDUCT**

The mission of Frankford Hospital is to provide exceptional patient care and customer service to our community. Pursuit of such excellence requires that we “do the right thing” in all of our affairs. This Code of Conduct is our blueprint to “do the right thing.” It provides the guiding standards for our decisions and actions. We recognize that this Code of Conduct can not cover every situation in the daily conduct of our many activities. We also recognize that this Code of Conduct can not substitute for our common sense, individual judgment and personal integrity, for which we are all accountable. But this Code sets a common standard for our actions, behavior, and attitude. It is our duty to adhere, without exception, to the principles set forth herein so that our day to day conduct is in harmony with the mission and the character of Frankford Hospital.

## **Our Code of Conduct:**

*At Frankford Hospital, we will provide exceptional care to our patients, show respect and dignity toward all members of our community, honor our patient's right to privacy, comply with all applicable laws, avoid conflicts of interest, and conduct all business practices with honesty and integrity.*

This Code of Conduct augments but does not limit specific policies and procedures of Frankford Hospital. We must perform our duties in accordance with such policies and procedures. It is our duty to uphold the Code of Conduct and to report any violations of this Code. Alleged violations will be investigated by appropriate personnel and disciplinary action for violations shall be enforced through the disciplinary policies and procedures of Frankford Hospital. Disciplinary actions will be determined on a case-by-case basis and may include dismissal from employment.

Officers, managers and supervisors of Frankford Hospital have a special duty to adhere to the principles set forth in the Code of Conduct. In addition to following the Code, these individuals must also support other members in our organization in their adherence to the Code, they must recognize and detect violations of the Code, and they must enforce the standards set forth herein.

This Code continues to be an evolving document, maturing with us as we face the many challenges that manifest as we strive to provide quality healthcare to the community. We encourage you to offer your suggestions to add to this maturity. The language, breadth, and range of this Code may alter, but the spirit of this declaration will always be grounded in the virtue of honesty, integrity, and an unwavering commitment to “do the right thing.” ✱

## What does our Code of Conduct mean?

### **1. We will provide exceptional care to our patients.**

We recognize that our patients trust us with their lives. We will always be respectful of this sacred trust and in return we offer our compassion, our competence, and our courtesy. We will maintain a safe and clean environment for our patients. We seek to provide health services of the highest quality that respond to the needs of our patients, their families and the community as a whole. We continuously seek ways to improve the quality, safety and affordability of health care.

### **2. We will show respect and dignity toward all members of our community**

We are committed to treat both patients and their families with the utmost of respect. We understand that ill patients can at times be demanding and challenging. We will always be polite, show concern, and when necessary, we will apologize and take action to amend the situation.

We know that to establish a culture of respect, we need to include all members of our community with whom we interact. In addition to treating our patients and visitors with respect, we must also always show respect and dignity towards our co-workers, medical staff, and volunteers. We are committed to providing educational and employment opportunities for all persons, without regard to race, color, nationality or ethnic origin, religion, gender, age, sexual orientation, or disability. We will respect the dignity of each individual in the community. We will not tolerate harassment or any type of prohibited discrimination in any form or context in our environment.

We recognize the value of every member of our staff and we will work to ensure a safe workplace that conforms to regulations regarding occupational health and safety.

We are respectful of the earth's environment, therefore, all medical waste, hazardous waste and other products shall be used and disposed of in accordance with all applicable environmental laws and regulations.

### **3. We will honor our patient's right to privacy**

In the course of our activities we have access to a variety of personal and sensitive information about our patients. Federal and State laws obligate us to protect the confidentiality of this information. Our commitment to our patient's care compels us to respect their privacy. We must adhere to the appropriate laws, regulations, policies and procedures to ensure that confidential information is properly maintained and to prevent unauthorized access to that information. We will follow proper procedures when discarding confidential patient information. We will not discuss patient information in areas where others can overhear the conversation. We will work to ensure proper safeguards are used to shield our patient's data and to secure the trust they placed with us when they gave us their information.

### **4. We will comply with all applicable laws**

We will conduct all activities in accordance with the highest ethical standards at all times and in a manner which shall uphold Frankford Hospital's reputation and standing. Each of us is responsible for knowing

## *What does our Code of Conduct mean? (Continued)*

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the legal requirements and restrictions applicable to our position and duties at Frankford Hospital. We will uphold all applicable laws and regulations.

Any questions about the legality or propriety of any actions undertaken by or on behalf of Frankford Hospital should be referred immediately to one's supervisor, the Frankford Hospital Compliance Officer or the Frankford Hospital Legal Counsel. To provide further assistance, Frankford Hospital has implemented a Compliance Hotline, a confidential telephone service that can be reached by dialing 1-888-5COMPLY. Calls made to the Compliance Hotline can be made anonymously. It is a violation of this Code of Conduct to take any actions in reprisal against anyone who reports, in good faith, either directly to management or through the Compliance Hotline, suspected violations of the Code of Conduct or other Frankford Hospital policies and procedures.

We will implement programs necessary to maintain awareness and to monitor and promote compliance with laws and regulations. We will refrain from engaging in activity which may jeopardize the tax exempt status of the organization, including inappropriate lobbying and political activities. We will create and keep records and documentation that conform to legal, professional and ethical standards.

### **5. We will avoid conflicts of interest**

Frankford Hospital is a non-profit organization dedicated to the provision of health care, education of health professionals and performance of health-related research. In our assigned roles and tasks, we must faithfully conduct our duties for the purpose, benefit and interest of Frankford Hospital and those whom it serves. Our Community Members must avoid conflicts, including even the appearance of a conflict, with the interests of Frankford Hospital and may not use their positions and affiliations with Frankford Hospital for personal benefit. We must avoid situations in which an employee's or staff member's responsibility to Frankford Hospital might be, or appear to be, compromised by outside obligations.

### **6. We will conduct all business practices with honesty and integrity.**

We acknowledge that in all that we do and in all that we say, we can either polish or tarnish the reputation of Frankford Hospital. We seek to promote and continue the superior reputation of this organization. We will not make false or misleading statements to any patient, person or entity doing business with Frankford Hospital. We understand that our community counts on the integrity of our actions.

We recognize that we operate in a complex system, with intricate responsibilities and with multifaceted obligations. But even when faced with the most difficult decisions, even when our actions may undoubtedly be concealed, we will take no action that can not bear the light of day, the informed scrutiny of our community, and the thorough judgement of our collective conscience. Honesty will be our guide. Accordingly:

- We will adhere to proper business practices and federal and state fraud and referral prohibitions in dealing with vendors and referral sources.
- We will conduct business transactions free from offers or solicitation of gifts, favors or other improper inducements.

## *What does our Code of Conduct mean? (Continued)*

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- We will conform to all applicable antitrust laws and regulations, and ensure that Frankford Hospital does not violate laws and regulations with respect to (i) pricing or other sale terms or conditions, (ii) improper sharing of competitive information, (iii) the allocation of territories or (iv) the impermissible exclusion of others from economic activities.
- We will maintain and protect the property and assets of Frankford Hospital, including intellectual property and proprietary information, controlled substances and pharmaceuticals, equipment and supplies, and funds.
- We will never tolerate the converting of Frankford Hospital assets to personal use.
- We will maintain the confidentiality of proprietary information belonging to other persons or entities doing business with Frankford Hospital.
- We will prepare accurate financial reports, accounting records, research reports, expense accounts, time sheets and other documents so that they completely and accurately represent the relevant facts and true nature of all Frankford Hospital business transactions.
- We will ensure that all of our requests for payment are for services that are reasonable, necessary and appropriate, are provided by properly qualified persons, and the claims for such services are billed in the correct amount and supported by appropriate documentation. \*

## Questions & Answers to assist us in *Doing The Right THING*

The following questions and answers are not intended to provide answers to every question that you may have but rather to increase your understanding of how the specific guidelines must be applied.

### *Violations of Law*

**Q:** I am worried that my supervisor may be violating a law, but am not really sure. What should I do?

**A:** As a member of the Frankford Hospital community, you have a responsibility to report suspected problems. In fact, employees may be subject to corrective action if they do not report such problems. Report your concern to someone else in management at your facility or to the Corporate Compliance Department directly or via **ComplyLine** (1-888-5COMPLY). All information received by the Corporate Compliance Department will be kept in strict confidence to the extent permitted by law. As long as you honestly have a concern, our policy prohibits your being reprimanded or disciplined in any way.

**Q:** What should I do if my supervisor asks me to do something that I think is illegal or violates the Code of Conduct or Frankford Hospital member organization policies?

**A:** Don't do it. No matter who asks you, if you know it is wrong, you must refuse to do it. You must also immediately report the request to a level of management above your supervisor, to the Corporate Compliance Department or to **ComplyLine**.

**Q:** Sometimes the "rules and regulations" get in the way of getting the job done. Isn't it more important to see that things get done than to worry about all the procedures?

**A:** Getting the job done by going around the rules is not acceptable, and this approach exposes Frankford Hospital to considerable risks. In the long run, taking a "shortcut" instead of completing a job the right way never saves time. If you think you don't have time to do the job the right way, where are you going to find the time to fix it later? You will actually save time by following the rules and getting it right the first time.

### *Ethical Standards*

**Q:** Can employees really get dismissed for violating Frankford Hospital ethical standards?

**A:** Yes, Frankford Hospital takes these standards seriously and intends to enforce them. The standards apply to everyone. Any employee—no matter what his or her level in the organization—who has violated the ethical standards outlined in the Code of Conduct will be disciplined in an appropriate and consistent manner ranging from warning to dismissal.

**Q:** How do I know if I am on ethical "thin ice?"

**A:** If you feel a sense of uneasiness about what you are doing, if you are worried about whether your actions will be discovered, or if you are rationalizing your activities with "everybody does it" type of thinking, you are probably on ethical "thin ice." Stop, think about what you are doing and get advice.

### *Conflicts of Interest*

**Q:** I am thinking of starting my own outside business. Is this a conflict of interest?

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**A:** An outside business activity does not necessarily put you in a conflict of interest situation. You should inform your supervisor of your intention. He or she will help you to determine whether the activity constitutes a conflict of interest. It is your responsibility to ensure that your outside business activities are strictly separated from your responsibilities at Frankford Hospital and that:

- you do not conduct any of your outside business during Frankford Hospital work time;
- customers and colleagues from your outside activity do not contact you at Frankford Hospital;
- you do not share any confidential information regarding Frankford Hospital;
- you do not use Frankford Hospital equipment and supplies for your outside work; and
- you do not promote your outside products or services to other Frankford Hospital employees during work hours.

**Q:** My brother works for a company that is currently proposing to provide services to Frankford Hospital. Is that a conflict of interest?

**A:** If your brother is seeking to provide services to Frankford Hospital, you must ensure that you do not use your position at Frankford Hospital or information that you obtain at work to influence the negotiation process in any way. You should make your supervisor aware of the situation so that even the appearance of favoritism is avoided.

### ***Patient Care***

**Q:** I am concerned that a newly hired clinician is not following all the policies and procedures for our department. What should I do?

**A:** High quality patient care is critical to the Frankford Hospital mission. You should talk openly and honestly to your supervisor about your concerns or contact the Corporate Compliance Department.

### ***Confidentiality***

**Q:** A physician in our hospital sometimes requests medical records, whether he is taking care of the patient or not. Is he permitted to do this?

**A:** No. Only the attending, covering, or consulting physicians and researchers involved in approved research projects may have access to patient medical records. Patients are entitled to expect confidentiality and protection of their privacy. We must do everything we can to meet these expectations.

**Q:** Health care issues are hot topics for conversation with relatives, friends and professional colleagues outside of Frankford Hospital. I'm never sure how much I'm allowed to tell people about my work or Frankford Hospital. How can I tell whether things that I know are considered to be confidential?

**A:** As a general rule, all information related to Frankford Hospital should be considered to be confidential unless it has been released in public documents. When in doubt, ask your supervisor, Frankford Hospital Legal Department, or the Corporate Compliance Department. If they are not immediately available, it's best to remain silent.

### ***Harassment***

**Q:** A co-worker keeps making embarrassingly personal remarks to me and asking me out to social events outside of work hours. I consistently refuse these invitations and have made it clear that these

## Questions & Answers to assist us in *Doing The Right THING*

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attentions are not welcome, but it doesn't seem to make any difference. Is this harassment? What should I do?

**A:** Yes, it is harassment. You should immediately speak with your supervisor or a representative from the Human Resources department.

### ***Relationships with Patients***

**Q:** A grateful patient gave me a cash gift on his date of discharge. Am I permitted to keep the money?

**A:** Cash gifts from patients are against Frankford Hospital and member organization policy and you should explain this to the patient as diplomatically as possible. You may suggest that the patient contact the appropriate development office to make a cash contribution to the facility. If the patient gives a non-cash gift of gratitude, it should be shared with the other members of your department.

### ***Relationships with Physicians***

**Q:** I have heard that some relationships between hospitals and physicians are illegal. What should I do if I think that such a relationship exists?

**A:** You are right to be concerned about this issue. Frankford Hospital should not be involved in any relationship that could provide a financial reward to a physician for referring patients to Frankford Hospital facilities. To make sure that our relationships with our referring physicians do not create legal problems, Frankford Hospital requires that business arrangements between Frankford Hospital and a referring physician be put into a written agreement which describes the responsibilities of both Frankford Hospital and the physician. For example, if a physician sees patients in Frankford Hospital office space, Frankford Hospital must have the physician sign a lease which requires the physician to pay fair market value for the use of the office space as well as for any Frankford Hospital staff or equipment. Any questionable relationships with physicians should be investigated. Call the Corporate Compliance Department or ***ComplyLine*** to report your concerns.

### ***Relationships with Third-Party Payors***

**Q:** I work in the billing department and I do not always understand the complicated billing rules for some of our payors. I am concerned that if I don't get the bills out timely, I will be reprimanded. What do I do?

**A:** In no event should time pressures result in a violation of Frankford Hospital's standard to not knowingly submit incorrect bills to any payor source. For clarification of any rules, discuss the issue with your supervisor or contact the Corporate Compliance Department or ***ComplyLine***.

### ***Relationships with Suppliers***

**Q:** A supplier of Frankford Hospital gave me a bottle of wine and a box of chocolates at Christmas, and I accepted these gifts. Did I make a mistake?

**A:** In cases such as this, where the gift is relatively small, it is okay to accept the gift on behalf of your department. The chocolates may be shared with staff and visitors. Assuming the bottle of wine is relatively inexpensive, department staff could "draw lots" to determine who gets to take the wine home. But it is best to discourage a supplier from offering items that can not be shared on site by the entire department.

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### *Personal Use of Organization Resources*

**Q:** Can I type my spouse's resume on my computer?

**A:** Possibly. Check with your supervisor. If you use the computer during non-working hours, you may be permitted to type personal documents.

**Q:** I volunteer for Big Sisters. May I use the copy machine to make fundraising leaflets?

**A:** Again, check with your supervisor. Frankford Hospital encourages all employees to participate in volunteer activities. Organization equipment, however, must not be used for charitable or other non-business purposes without prior approval from your supervisor.

**Q:** I do volunteer work for a local candidate for office. May I use the copy machine for campaign flyers?

**A:** No, you may not use Frankford Hospital time or resources to support political activities that are undertaken on a personal basis, as is the case here. \*