

COMPASSPOINT

NAVIGATING ADVENTIST HEALTH SYSTEM'S CODE OF ETHICS

Navigating Adventist Health System's Code of Ethics




COMPASSPOINT

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Points of Integrity

From the President



We as individuals – and together as an organization that impacts thousands of lives every minute of every day – share many goals, beliefs and principles that guide our activities.

In fact, regardless of our individual talents and job descriptions, we have chosen to work together toward a common objective: to improve quality of life for those we serve.

Whether we work in long-term care facilities, doctors' offices, research centers, hospitals or home health agencies, we're guided in our day-to-day responsibilities by a personal commitment to honesty and integrity. The principles that direct our relationships with patients, fellow employees, business associates and government agencies are not only the highest ethical and legal principles, they're the moral principles of Christianity on which our institutions are founded.

Living up to the highest standards is more than a goal. Doing the right thing in every situation is more than an ideal.

These are our corporate responsibilities and our legal obligations. Adventist Health System's compliance program, *CompassPoint*, is in place to define the principles and requirements that guide our conduct each day.

Nothing is more important than our organization's reputation, and I'm proud of our history of excellent service to our communities. In setting forth our guidelines and expectations on the following pages, we remind ourselves of commitments and responsibilities, and establish a tool to provide guidance in complicated circumstances. Should a situation arise in which we fail to live up to our expectations, a course of action is detailed on page 40. I urge you to review this process and to understand your responsibilities as we continue to maintain the highest code of conduct.

Sincerely,

A handwritten signature in black ink that reads "Donald L. Jernigan". The signature is fluid and cursive, with a long, sweeping underline that extends to the right.

Donald L. Jernigan
President and CEO



Our Mission

Extending the Healing Ministry of Christ

With Christ as our example, we exist to assist in restoring and promoting the health and quality of life of those we serve. The guiding principles for all we do are embodied in our relationship with:

Our God. This corporation is founded on the Seventh-day Adventist legacy of Christian health. Serving the people who are sick and hurting is our response to a loving God who gave us the example of meeting physical, mental and spiritual needs.

Our Neighbors. As responsible stewards of the resources entrusted to us, we work in collaboration with the people in our communities to provide appropriate services that contribute positively to their quality of life.

Those We Serve. We strive to create for those whom we serve a beneficial environment of friendly, compassionate, extraordinary care that promotes comfort and healing.

Our Associates. We respect the diversity and contribution that employees, medical staffs, volunteers, vendors, business partners and the many others associated with our organization bring to the workplace, and conduct our business and work relationships with fairness and integrity.

Our Values

Adventist Health System employees draw motivation and direction from six strongly held principles. These principles guide the manner in which we treat each other and those we serve.

Christian Mission. We exist to serve the needs of our communities in harmony with Christ's healing ministry and incorporate Christian values at every level of service.

Quality and Service Excellence. We strive to meet or exceed both the service standards of the health care industry and the expectations of the patients we serve and measure our success through continuous surveying of patient satisfaction.

Compassion. We are sensitive to the needs of the individuals and families we serve and meet their needs with kindness and empathy.

Focus on Community Wellness. We commit time, talent and financial support to educate our neighbors in the principles of illness prevention and healthful living.

High Ethical Standards. We conduct our business with integrity, honesty and fairness. As responsible stewards, we use our financial resources wisely by choosing business practices which are cost-effective, productive and result in a fair return on investment.

Cultural Diversity. We value the diversity of our patients, employees, business colleagues and visitors and treat them with kindness and respect regardless of their background, race, religion or culture.



Our Nine Points of Integrity

From administrators to clinical staff, to contractors, regardless of our personal responsibilities, everyone associated with Adventist Health System is a representative of the larger organization.

We/I shall ...

- 1.** Comply with all applicable federal, state and local laws and regulations, being guided by the basic principles of honesty and fairness.
- 2.** Deliver medically necessary health care in a compassionate, respectful and ethical manner without regard to race, creed, color, religion, national origin, gender or disability; treat patients with dignity and respect at all times; provide each patient with information regarding their rights and responsibilities, endeavoring to protect those rights throughout their care and treatment.
- 3.** Maintain accurate and reliable patient and organizational records; prepare corporate records honestly and in accordance with established finance and accounting procedures.

4. Maintain contacts with government officials and personnel in a professional manner, affirming the high integrity of the organization.
5. Provide patients with understandable explanations of services rendered; hold responsible parties financially accountable only for care rendered; seek to resolve business conflicts in a fair and equitable manner.
6. Carry out our organization's public and commercial communications in a manner consistent with our mission; ensure that our marketing and advertising statements are accurate and sensitive to community culture without false or misleading statements.
7. Continually examine our practices to identify, avoid or eliminate potential conflict of interests.
8. Maintain the privacy of our patients' information
9. Provide the same high quality of care, regardless of means or status.

These nine Points of Integrity are further detailed in the pages that follow.



1. Fulfill Regulatory Responsibilities

We are committed to honoring all legal requirements.

We/I shall ...


- ✚ Comply with all applicable federal, state and local laws, and regulations.
- ✚ Be guided by the basic principles of honesty and fairness.
- ✚ Remain knowledgeable about pertinent laws and regulations.

2. Provide Excellent Care

We are committed to delivering medically-necessary health care in a compassionate, respectful manner.

We/I shall ...

- ✚ Provide care in a respectful, ethical manner without regard to race, creed, color, religion, national origin, gender, or disability.
- ✚ Respect each patient's right to impartial access to all medical care, treatment or accommodations that are available and medically indicated.

- 
- ⚓ Provide each patient with information regarding rights and responsibilities, and endeavor to protect those rights throughout their care and treatment.
 - ⚓ Respect the patient's right to know which support services are available within our facilities.
 - ⚓ Respect the patient's right to receive medical or obstetrical screening examinations to determine if an emergency medical condition exists; provide additional care or treatment to stabilize the condition, within the capabilities of the staff and facility.
 - ⚓ Provide a reasonable estimate for charges for services, when requested and before medical services are provided, although actual charges will depend on the patient's condition and treatment needs.
 - ⚓ Respect the patients' right to receive an itemized bill and to have charges explained.

A complete list of patient rights is available from Nursing Administration at each facility.

3. Maintain Accurate Records

We are committed to ensuring accurate and reliable patient and organizational records.

We/I shall ...

- ⚓ Prepare corporate records honestly and in accordance with established finance and accounting procedures.
- ⚓ Keep all records and activities in an open and honest manner, with no secret or unrecorded funds or assets and with no false or fictitious entries in any books or records of Adventist Health System or its subsidiaries.
- ⚓ Act only in a lawful manner on behalf of Adventist Health System or its subsidiaries.
- ⚓ Commit to pay finder's, promoter's, consultant's and other similar fees only when such arrangements meet the criteria established in the corporate assets policy.
- ⚓ Keep all patient records confidential, except when release of information is authorized.

4. Ensure Appropriate Official Contacts

We are committed to maintaining contacts with government officials and personnel in a professional manner, affirming the high integrity of the organization.

We/I shall ...

- ✚ Use funds and assets for legal political contributions only, and only when appropriate.
- ✚ Engage in no political campaign activities, including the contribution of money in the name of Adventist Health System.

5. Deliver Financially Responsible Care

We are committed to openness, honesty and accuracy in billing for services.

We/I shall ...

- ✚ Provide patients with understandable explanations of services rendered.
- ✚ Hold responsible parties financially accountable only for care rendered.

- ⚓ Seek to resolve business conflicts in a fair and equitable manner.
- ⚓ Provide an estimate of charges before services are rendered, when requested.
- ⚓ Not charge Medicare beneficiaries higher amounts than those charged to other persons for similar services.
- ⚓ Evaluate each situation of financial hardship individually, determining whether a patient is able to pay any out-of-pocket amounts, and follow with an appropriate plan of action.

6. Advertise and Communicate Honestly

We are committed to carrying out our public and commercial communications in a manner consistent with our mission.

We/I shall ...

- ⚓ Ensure accuracy and sensitivity to community culture in marketing, advertising and commercial communications intended to advance our organizational objectives.
- ⚓ Offer factual information or documented evidence to the general public, without distorting the truth,

making false claims, engaging in comparative advertising or employing disparaging or attacking tactics against another provider of services.

- ⚓ Enter only into open, honest agreements that are not intended to fix prices or reduce price competition.
- ⚓ Protect our organization's business information, providing such information to a competitor only when necessary to consummate a bona fide customer/supplier relationship or to serve specific customers jointly.
- ⚓ Make good-faith efforts to collect coinsurance and deductibles when patients are covered by health benefits.

7. Strive for Fairness in All Activities

Because conflict of interests can occur in any organization, we continually examine our practices to identify, avoid or eliminate potential areas of difficulty.

We/I shall ...

- ⚓ Avoid the appearance of favoritism, and not give or accept any benefits (seen as a gift or favor of value) in business relationships with government officials, commercial firms or others with whom the corporation

or its subsidiaries do business, unless the nature, value and circumstances are generally regarded as reasonable, proper and customary in light of prevailing ethical business practices, and giving or receiving the benefit does not violate the law.

- ⚓ Treat fairly and impartially all persons and firms with whom we have business relationships.
- ⚓ Enter only into business relationships that will not conflict or appear to conflict with our Adventist Health System responsibilities.
- ⚓ Participate only in appropriate outside activities, and not render services to, or represent or act for, any outside or competing concern, whether for compensation or not, unless it is determined that these activities will not create a conflict.



8. Privacy of Patient Information

We are committed to maintaining the privacy of patient information.

We/I shall ...

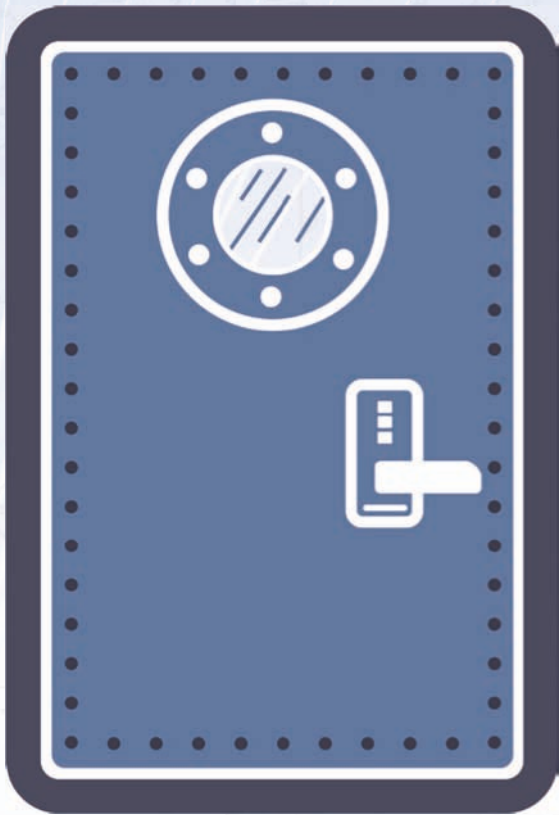
- ✚ Only access, use, or disclose, on a legitimate “need to know” basis, patient information for activities related to treatment, payment, and health care operations on behalf of the company.
- ✚ Only access, use, or disclose the minimum information necessary to perform our designated role regardless of the extent of access provided.
- ✚ Provide to each patient a *Notice of Privacy Practices* which will inform them of their rights with respect to protected health information as well as Adventist Health System’s legal duties.
- ✚ Not release information for purposes other than treatment, payment, and health care operations without written authorization from the patient, except as required by applicable federal, state, or local laws and regulations.

9. Standard of Care

We are committed to maintaining the same high-quality standard of care for all patients, regardless of means or status.

We/I shall ...

- ⚓ Provide consistent health care to each patient, based on his/her individual needs. This includes all tests, treatments, and other appropriate services.
- ⚓ Provide care equally for all patients, regardless of compensation or insurance arrangements.



Patient Privacy & Security

The Right Direction

Adventist Health System is committed to maintaining the privacy of patient information. Because of this commitment our patients have enjoyed a long-standing tradition of maintaining confidentiality. Additionally, our system has implemented privacy and security best practices in order to ensure these protections not

only to our patients, but to our employees as well. Because we are entrusted with information about people, breaches in privacy and security can result in far more than mere financial losses. They can result in damaged reputations.



This helpful guide will acquaint you with the proper and appropriate ways to maintain the privacy of patient information through compliance with the Health Insurance Portability and Accountability Act of 1996 (HIPAA) Privacy and Security Rules. Although not intended to be comprehensive, this guide will assist you in understanding your role and responsibility for protecting patient data. While most

of these measures are already in place and you practice them daily, please use this guide as a reminder of the most basic ways to help protect your patients, their personal information, and yourself.

What is HIPAA?

The Health Insurance Portability and Accountability Act of 1996 (HIPAA) took effect on April 14, 2003 and is a set of rules to be followed by health plans, doctors, hospitals and other health care providers. The HIPAA Privacy and Security Rules 1) establish standards to protect the confidentiality of individually identifiable health information, 2) provide new rights for individuals with respect to their protected health information, and 3) mandate the obligations of health care providers.

The privacy and security components of the HIPAA legislation impact the use, transmission, and storage of protected health information (PHI). This goes beyond the traditional medical records. It includes anything that could individually identify the patient, such as medical and demographic information, the patient's name, address, phone number or birth date.

This also includes confidential information such as the reason a person is sick or in the hospital, treatments, medications, or any other observations about the patient's condition.

The Security Rule adopts standards for the security of electronic protected health information that is collected, maintained, used or transmitted electronically. These standards require measures to be taken to secure this information while in the custody of entities covered by HIPAA (such as Adventist Health System) as well as in transit between covered entities and from covered entities to others.

To be compliant, we have implemented procedures to provide patients access to their medical information. This includes their ability to 1) request copies, 2) request amendments to their records, and 3) provide accountings of any and all disclosures made of their medical information for any use other than treatment, payment and hospital operations.

As patient information becomes easier to transmit, such as through e-mail and the Internet, it also becomes easier for information leaks and abuses to occur. Therefore, it requires that all hospital personnel be vigilant and alert to these risks in order to prevent them from happening.

So What Does This Really Mean?

Essentially, patients have the right to control who will see or have access to their health information.

Communications with or about patients involving health information will remain private and be limited to only those with an authorized need to know. Such communications may involve verbal discussions and written or electronic communications. With the new HIPAA regulations, a patient's right to privacy became more than just an ethical obligation—it became the law.

Most Security Breaches Are Not Intentional

In many cases, security breaches happen because well-meaning employees do not realize that their actions leave information open to easy access or loss. Whether allowing unauthorized people into sensitive areas, downloading e-mail or files that seem “innocent,” or even sharing security credentials to help out a new or fellow employee, the best intentions can result in some serious security problems.

Physical security

When it comes to computers, physical security is where it all begins. While physical security includes protecting computers and equipment from things like theft or tampering, it also includes protecting them from accidents such as being knocked over or problems like

overheating and flooding. Here are a few thoughts to help protect our systems:

- ⚓ Food and especially drinks (or any liquids for that matter) don't mix well with computers. Avoid eating and drinking around computer equipment.
- ⚓ Make sure that equipment is set on stable surfaces where it is not likely to fall. Similarly, don't place equipment where things may fall on it (such as from a shelf above) or on the floor where it may be kicked, tripped over, etc.
- ⚓ If you are transporting devices such as laptops, PDA's, etc., keep an eye on them. These devices are often targets for thieves.
- ⚓ Keep equipment out of areas where excessive heat or humidity may ruin them. Mistakes like leaving a device in a car on a hot summer day can quickly ruin even the hardiest of equipment.
- ⚓ Pay attention to who is physically accessing workstations, devices, equipment closets, etc., in your area. Does it make sense that this individual should use the device or access the room? If you're not sure, contact your supervisor, manager or Information Services personnel.

Don't Let Anyone Else Be You

Although we are unique to those around us, this means nothing to a computer. Regardless of the method used to verify your identity, your security credentials, whether a password, badge, token or other form of ID, belong to you and you alone. Why is that so important?

With your security credentials, anyone can become you to the system. As far as the computer and its logs are concerned, anyone who can provide it with your credentials is you. Failure to protect these credentials can lead to loss of data, security compromise and you being held accountable for the actions of others.

So, how can you protect both data and your good name? Here are some basics:

- ⚓ Don't share your credentials with anyone, no matter how good your intentions. In the case of passwords, once known by others, they are no good and must be changed.
- ⚓ When it comes to passwords, don't use easy-to-guess passwords such as SSN, maiden name, child's name, license plate number, etc.



- ⚓ Use something you can remember such as the first few words of your favorite song, book or poem. This will help keep it complex, but easy for you to remember.
- ⚓ If you think your password has been compromised or you've lost a device such as a badge or token, report it immediately so that it can be deactivated and a new one issued to you.
- ⚓ Remember, there's only one of you, so don't let a sticky note with your password on it or a shared access card allow someone else to be as unique as you are.



Be Vigil. Be Aware. Be Alert.

"I never wanted to harm the people who opened the attachment. But after all: it's their own fault they got infected." — *OnTheFly*, creator of the Anna Kournikova virus

The previous quote tells us a lot about computer security. The most important thing is that our individual actions are what will really make the difference when it comes to security success.

Along with the advantages provided by electronic communications are the disadvantages of exposure—viruses, worms, Trojan Horses and any number of attempts to steal or destroy information.

The good news is that there are several ways you can help prevent the problem:

- ⚓ When you receive unexpected e-mail attachments, even from people you know, offers to download software from the Internet, or e-mail with "links" to websites asking you to provide information, be suspicious. When in doubt, call the sender and verify.
- ⚓ Make sure that antivirus software is active on your computers. While not perfect, it prevents 99.9 % of viruses before they become a problem.

- ⚓ If you believe a system you are using might be infected, contact your Help Desk immediately. Don't try to solve the problem yourself.

When sending information electronically, make sure you are sending information to the intended recipients. If the information contains protected health information as defined by HIPAA rules, Adventist Health System requires that the message be encrypted. Remember, without special precautions such as encryption, electronic communications can be more like postcards than private letters.

Bad Things Happen

Unfortunate situations can still occur even though precautions are taken. Therefore, it is important that your system is backed up. In many cases, system information on clinical applications is backed up by your IS team. However, there are lots of examples where backing up information depends on you. These include:

- ⚓ Information on your system's hard drive.
- ⚓ Information on a system that is exclusive to your department and is not maintained by your facility's IS department.
- ⚓ Information that is stored on CD's, disks and tapes within your department for archival purposes.

When backing things up, remember:

- ⚓ Set up a regular schedule to backup important files you couldn't easily recreate.
- ⚓ Label and properly store media. They should be in a safe place and reasonably far from the originals so that the same accident can't destroy both.
- ⚓ If the information on the backup is confidential, make sure it is stored in a location that limits its access to authorized persons only.

When backup tapes, CDs and disks are no longer needed, it is important to dispose of them properly, if they contain confidential information. When disposing of media with confidential information, here are a few things to keep in mind:

- ⚓ Realize that simply deleting a file does not mean that it can't be accessed.
- ⚓ To be truly "sanitized," media may undergo several processes including physical destruction.
- ⚓ Contact your IS department or security/privacy officer to learn where and how to dispose of sensitive media.

What to Do When Bad Things Happen

Although extensive precautions are put into place, security-related incidents can still occur. It is important to know what to do and what not to do.

What you need to do:

- ⚓ If you suspect that a security incident has occurred, contact your manager or supervisor, the help desk or your local security officer right away. An incident can include everything from encountering a virus to theft or destruction of media and systems. Even if you are not sure that an incident has taken place, it is always much better to raise the issue than ignore it.
- ⚓ Follow any instructions that are given. Often, the difference between an incident remaining small or becoming a large-scale problem is how it is handled at the time it is discovered.

- ⚓ When reporting a possible incident, provide as much information as possible and let the person you are contacting know how to reach you for follow up.

What you should **not** do:

- ⚓ You should not ignore the problem. The odds are you, not IS, will be the first to recognize that something might be wrong. If you don't report it, things may only get worse very quickly.
- ⚓ Just as important as informing the right people, is knowing who not to inform. Disclosure of security-related incidents to patients, the media, and even law enforcement is something that must be coordinated with management and public relations staff.
- ⚓ Don't take matters into your own hands. Security problems can be complicated and involve a number of systems. Verifying and resolving an incident can require both technical skills as well as help from management, human resources, compliance and various other departments. It's simply too easy to compound a problem without seeking proper help.

Do You Need to Know?

Other than protecting patient information electronically, there are a few other areas where patient information can be compromised. Most of HIPAA compliance is

common sense. Here are some simple things that you can do to help protect patient privacy:

- ⚓ Simply follow the “need to know” rule. Before looking at a patient’s health information or sharing it with anyone else, ask the question, “Do I need to know this to do my job?” If the answer is no, stop. If the answer is yes, there is no problem.
- ⚓ If you overhear any private health information as you do your job, keep it to yourself. This includes the fact that a patient is at our facility in the first place.
- ⚓ If you see patient information in an open trash container, report it to your supervisor to properly dispose of it.
- ⚓ If you see a violation of the privacy policy, tell your privacy officer or call the GuideLine at 1-888-92-GUIDE.

Authorization is a Must

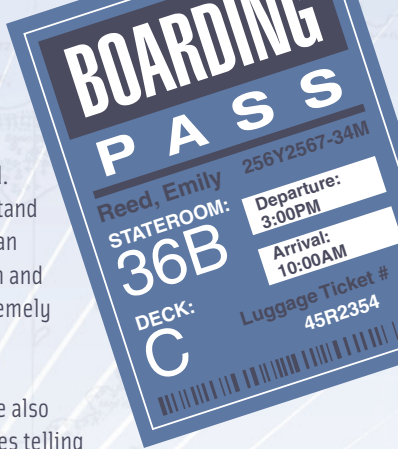
In order to share or use personal health information, such as releasing information to marketing organizations or financial institutions, you must receive written authorization from the patient. Through this authorization, a patient voluntarily agrees to let you use the information for a particular request or need. Patients also have the right to revoke their authorization

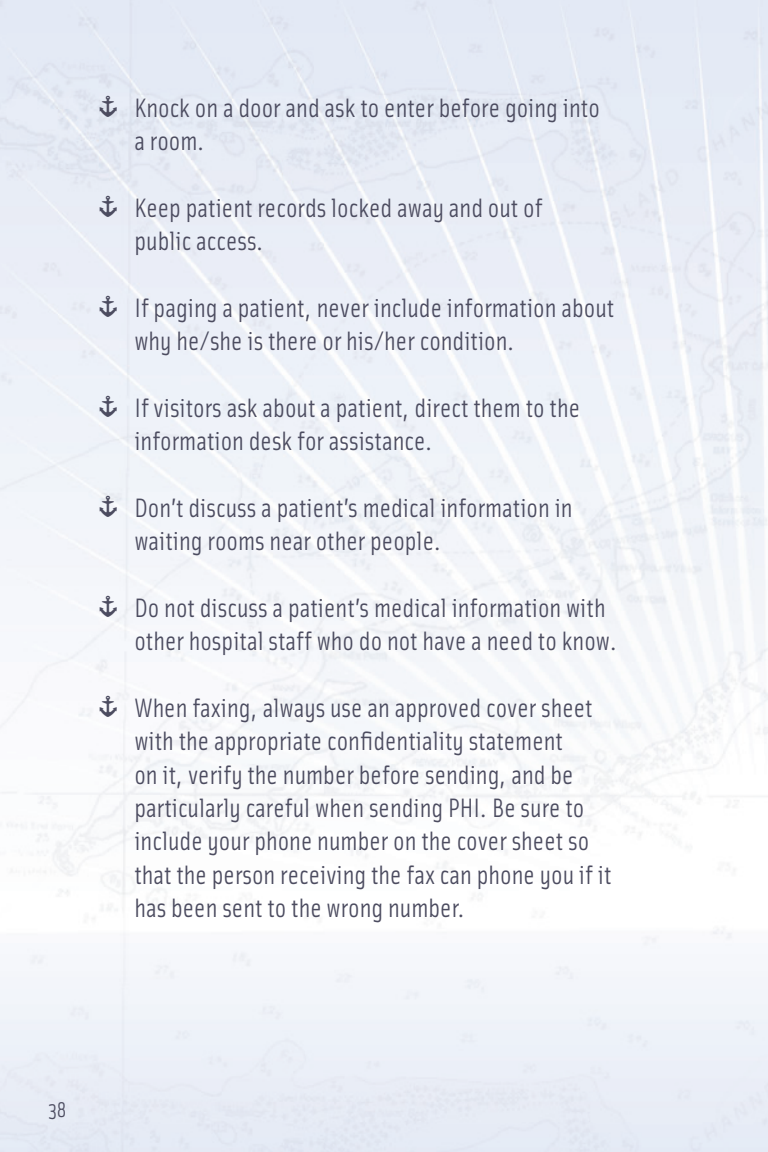
at any time, as well as to ask us to restrict how their information is used. Helping patients understand these rights, how they can protect their information and how we protect it is extremely important.

That's why the HIPAA rule also requires us to post notices telling patients about our privacy practices and policies and the ways we will use the information. These notices also remind them about the right to access their own information, and the right to request amendments to their information. We make a good faith effort to obtain a patient's written agreement that the patient received a copy of our notice of privacy policies.

Protecting Privacy

Quite simply, patients receiving medical care want privacy. From a closed door when consulting or interacting with their caregivers, to protecting their medical records or test results from others seeing or accessing them, we are committed to protecting patient privacy and confidentiality. So how can you help? Here are a few obvious, yet important suggestions:



- 
- ⚓ Knock on a door and ask to enter before going into a room.
 - ⚓ Keep patient records locked away and out of public access.
 - ⚓ If paging a patient, never include information about why he/she is there or his/her condition.
 - ⚓ If visitors ask about a patient, direct them to the information desk for assistance.
 - ⚓ Don't discuss a patient's medical information in waiting rooms near other people.
 - ⚓ Do not discuss a patient's medical information with other hospital staff who do not have a need to know.
 - ⚓ When faxing, always use an approved cover sheet with the appropriate confidentiality statement on it, verify the number before sending, and be particularly careful when sending PHI. Be sure to include your phone number on the cover sheet so that the person receiving the fax can phone you if it has been sent to the wrong number.

Help Us Help Our Patients and You

As a member of the Adventist Health System family, you share the responsibility to help maintain privacy for our patients as they receive care and help protect the confidentiality of information that patients entrust to us. Here's what you can do:

- ⚓ Only access, use, or disclose, on an authorized "need to know" basis, patient information for activities related to treatment, payment and health care operations on behalf of the company.
- ⚓ Only access, use or disclose the minimum information necessary to perform your job.
- ⚓ Upon admission, provide each patient a *Notice of Privacy Practices* that will inform them of their rights with respect to protected health information as well as Adventist Health System's legal duties.
- ⚓ Only release information to outside entities with written authorization from the patient, except as permitted by applicable federal, state or local laws and regulations.

Course of Action

Although we strive to meet our expectations, responsibilities and high ethical standards 100 percent of the time, if you're aware of a situation that misses the mark, you may have a moral or legal responsibility to bring it to light. Several avenues are available to you.

First, if possible, bring the issue to the attention of your supervisor. If for any reason you are not comfortable with this, see a Human Resources representative or contact your local compliance officer or the Adventist Health System's chief compliance officer.

If these options are not available or if you have concerns about them, call the GuideLine any time, day or night, at 1-888-92-GUIDE. The GuideLine's complete confidentiality allows you to raise any issues and ask any questions without fear of being identified.

Calls to the GuideLine are never traced or recorded. A confidential report, based on the information you provide, will be forwarded to Adventist Health System's corporate office for review, investigation and, when appropriate, corrective action. Using a unique identification number assigned to your initial call, you may follow up with the GuideLine to check the status of the results of the process.

Check Your Compass

When following the right path, it's necessary from time to time to check your bearings and confirm your course. Ask yourself:

1. Am I following the law?
2. Am I treating others as I would like to be treated?
3. Am I setting a good example?
4. Will I feel good about my actions tomorrow?
5. Would my actions look good in print or on the evening news?
6. Am I protecting my patient's privacy?
7. Am I discreet when sharing patient information?

Warning Signs!

"Well, maybe just this once"

"We didn't have this conversation."

"Everyone does it."

"What's in it for me?"

"No one will ever know."

"She won't care if I tell them."

"He would want me to know."



Thank you for reviewing this Guide and setting a course to compliance that can only benefit you and our patients. If you have any questions or need further information, contact your local compliance and privacy officer.

Key Compliance Contacts

Supervisor:

Local Compliance & Privacy Officer:

HR Representative:

AHS Chief Compliance & Privacy Officer:

GuideLine:

1-888-92-GUIDE
(4 8 4 3 3)

Receipt & Acknowledgement

I acknowledge that I have received my personal copy of Adventist Health System's CompassPoint Code of Ethics Pocket Guide. I understand that I am responsible for knowing and following the code of ethics represented in the Guide. I also understand that I am responsible for reporting any violations of the Guide to the appropriate Corporate Compliance representative, or the GuideLine.

Signature:

Print Name:

Department:

Date:



 **Adventist**
HEALTH SYSTEM