



# Code of Conduct



Quality, honesty and integrity in everything we do are important values to all of us who are associated with Evergreen Healthcare. We are committed to providing quality health care and services in full compliance with our mission and organizational values. We live in a world of constantly changing regulations and requirements. We are committed to adhering to these laws, government regulations, third-party payor agreements and our own policies and have implemented a Corporate Compliance Program to assist in this process.

A key element of the Compliance Program is our *Code of Conduct*. Our *Code of Conduct* is based on our mission and values, and re-affirms the values and professional standards that already exist among all who are associated with Evergreen Healthcare.

A foundation of this is our commitment to protecting the integrity of clinical decision-making based on patient assessment regardless of compensation arrangements.

Our *Code of Conduct* was designed to serve several purposes:

- To communicate the commitment of management to comply with laws, regulations, standards of care, ethical business practices and the basic standards expected in the workplace; and
- To ensure that each employee understands his or her responsibility for keeping in full compliance with these laws and regulations and specifically his or her responsibility as part of Evergreen's Compliance Program

Our *Code of Conduct* and our Compliance Program have the full endorsement of the Board of Commissioners, as well as the management team. Familiarize yourself with this document. It provides an overview of the compliance program and the general areas that it covers.

## INTRODUCTION

We at Evergreen Healthcare recognize that our employees are the key to providing a high-quality health-care experience for both clinical and non clinical business activities. We also recognize that we must act in accordance with our *Code of Conduct*, policies, procedures, laws and regulations. Failure to do so can result in serious consequences for individual employees and medical staff members, as well as the organization. Each employee has an affirmative duty to report compliance issues—failure to do so can result in termination. Our *Code of Conduct* and our Compliance Program apply to all employees, board members, providers, volunteers, students and other individuals authorized to act as representatives of Evergreen Healthcare.

While our *Code of Conduct* is designed to provide overall guidance, it does not address every situation. More specific guidance is provided in Evergreen Healthcare’s Policies and Procedures. These can be found on Evergreen’s Sharepoint intranet site. If there is no specific policy or if a policy and the *Code of Conduct* provision conflict, our *Code of Conduct* becomes the policy. The *Code of Conduct* is a “living document” that will be updated periodically to respond to changing conditions or regulations. Questions regarding our *Code of Conduct*, or any compliance issue, should first be directed to your immediate supervisor, then through the chain of authority up to and including the Compliance Officer or upper management. Issues can also be reported confidentially and anonymously to the compliance hotline or the Compliance Officer. For more information about the hotline and placing an anonymous call, please refer to organizational policy *ADM 175.4 Corporate Compliance Hotline*.

The term “we,” as used in this document, is meant to refer collectively to employees, board members, providers, volunteers, students and other individuals who are authorized to act as representatives of Evergreen Healthcare.

The foundation of our *Code of Conduct* is our Mission, Purpose and Shared Commitments:

## **MISSION**

Evergreen Healthcare will advance the health of the community it serves. Individuals will reach their highest potential for health through access to high-quality, compassionate, cost-effective health care.

## **PURPOSE**

Working together to enrich the health and well-being of every life we touch.

## **SHARED COMMITMENTS**

- *Health Promotion:* We champion healthy lifestyles and personal responsibility for well-being.
- *Belief in People:* We create an organization where everyone counts and everyone cares.
- *Continuous Value Improvement:* We are unconditionally committed to improving quality, reducing costs and increasing satisfaction.
- *Accessibility:* We constantly endeavor to make health-care services and information easy to find, use and understand.
- *Teamwork:* We work in partnership with staff, physicians and the community.
- *Respect:* We honor individual choice, preserve confidentiality and show compassion in every interaction.
- *Innovation:* We are leaders in anticipating and meeting community health needs.
- *Financial Responsibility:* We generate and manage the resources needed to continue our service to the community.
- *Environment:* We respect the earth and actively participate in its protection.

## **STANDARDS OF CONDUCT**

All of Evergreen Healthcare's business affairs must be conducted in accordance with federal, state and local laws, professional standards, applicable federally funded health-care program regulations and organizational policies with honesty, fairness and integrity. Employees should perform their duties in good faith, in a manner that he or she reasonably believes to be in the best interest of Evergreen Healthcare and its patients and with the same care that a reasonably prudent person in the same position would use under similar circumstances.

## **EMPLOYEE CONDUCT**

Let the following principles guide your behavior and conduct:

### *ALWAYS...*

- Conduct your job with truth, integrity and fairness.
- Treat everyone, including patients, employees, physicians and visitors, with respect and courtesy.
- Document your activities accurately and completely.
- Maintain the confidentiality of all information, written and verbal, related to patients and to the business of the organization.
- Report any real or suspected violation of policy or law to your supervisor or the Corporate Compliance Officer.
- Disclose actual and potential conflicts of interest.
- Ask if you are unsure about the ethicality of your actions.

### *NEVER...*

- Make incomplete or inaccurate entries in any hospital medical record, business record or claim for payment.
- Accept any gifts of more than nominal value, or cash—including tips.
- Seek or accept payment for referrals you receive; or offer to pay, or pay for referrals.
- Make political contributions or engage in political activity on behalf of the organization.

- Misuse Evergreen assets or use Evergreen property for personal reasons.
- Participate in a matter where you have an actual or perceived conflict of interest.

## **ANTI-COMPETITIVE CONDUCT**

Evergreen Healthcare will not engage in anti-competitive conduct that could result in an unreasonable restraint of trade or a substantial lessening of competition. Communications with competitors about matters that could be perceived to have the effect of lessening competition or could be considered as collusion or an attempt to fix prices should take place only with administrative approval after consultation with legal counsel.

## **ANTI-KICKBACK AND FRAUD AND ABUSE LAWS**

Employees shall refrain from any conduct that may violate anti-kickback and self-referral laws or fraud and abuse laws. These laws prohibit:

- Direct, indirect or disguised payments in exchange for the referral of patients (*Policy ADM 175.7, Anti-kickback and Self Referral*)
- The submission of false, fraudulent or misleading claims to any government entity or third-party payor, including but not limited to claims for services not rendered, claims for medically unnecessary services, claims that characterize the service differently than the service actually rendered, or claims that do not otherwise comply with applicable program or contractual requirements (*Policy ADM 175.6, Corporate Compliance Program Auditing and Monitoring*)
- Making false representations to any person or entity in order to gain or retain participation in a program or to obtain payment or excessive payment for any service

## **BEHAVIORAL STANDARDS**

As a critical component of our success, we expect each member of our workforce to provide excellent customer service to our patients, visitors, and each other. This includes treating *all* of our

customers with respect, understanding, and caring, as well as demonstrating a positive, “can-do” attitude in all interactions and situations. (*Behavioral Commitments in each job description*)

## **BUSINESS ETHICS**

Employees must accurately and honestly represent Evergreen and must not engage in any activity or scheme intended to defraud anyone of money, property or services. Personal conduct that violates this Code *and* reflects negatively on Evergreen may also result in corrective action.

## **CONFIDENTIALITY OF INFORMATION**

Patients’ health-care records are the property of Evergreen and shall be maintained to serve the patient, necessary health-care providers, the institution and third-party payors in accordance with legal, accrediting and regulatory agencies. The information contained in the health-care record belongs to the patient and must be protected. All patient-care information must be regarded as confidential and available only to authorized users, such as treating or consulting physicians, employees who are involved in providing treatment, payment processing or health-care operations, and to third-party payors in order to facilitate reimbursement. The operations, activities, business affairs and finances of Evergreen should also be kept confidential and discussed or made available only to authorized users for Evergreen’s business purposes (*HR policies 100:13, Confidentiality/Professionalism & Ethical Behavior; 400:32, Information Privacy and Security Sanctions; and HIPAA policy IPS 101, Access to Health Information; and Administrative Policy ADM 132 Patient Rights and Responsibilities*).

## **CONFLICT OF INTEREST**

In order to perform their duties with honesty and fairness and in the best interest of Evergreen Healthcare, employees must avoid conflicts of interest in their employment. A conflict of interest or the appearance of a conflict of interest may exist when employees, by reason of their position, authority or knowledge, allow or cause themselves, friends and relatives or anyone with personal ties to

benefit directly or indirectly by their actions on behalf of the organization, or allow or cause the organization to be adversely affected in any way.

Conflicts also may arise in other ways. If an employee has any doubt or question about any of his or her proposed activities, guidance or advice should be obtained from his or her supervisor or Human Resources (*Policy ADM 126, Conflicts of Interest*).

## **CREDIT BALANCES**

Evergreen Healthcare will comply with federal and state laws and regulations governing credit balance reporting and refund all overpayments in a timely manner.

## **FINANCIAL INDUCEMENTS**

No employee shall offer any financial inducement, gift, payoff, kickback or bribe intended to induce, influence or reward favorable decisions of any government personnel or representative, any customer, contractor or vendor in a commercial transaction or any person in a position to benefit Evergreen or the employee in any way.

Appropriate commissions, rebates, discounts and allowances are customary and acceptable business inducements provided that they are approved by Administration and that they do not constitute illegal or unethical payments. Any such payments must be reasonable in value, competitively justified, properly documented and made to the business entity to whom the original agreement or invoice was made or issued. Such payments should not be made to individual employees or agents of business entities.

## **FINANCIAL REPORTING**

All financial reports, accounting reports, research reports, expense accounts, time sheets and other documents must accurately and clearly represent the relevant facts or the true nature of a transaction. Improper or fraudulent accounting, documentation or financial reporting is contrary to Evergreen policy and a violation

of applicable laws. Sufficient and competent evidential material or documentation shall support all cost reports.

## **PATIENT RIGHTS**

We recognize the personal dignity of all patients and respect their right to participate in decisions regarding medical care and to access and control the use and disclosure of their protected health information (*Policies ADM 132, Patient Rights and Responsibilities, and IPS 117, Notice of Privacy Practices*).

## **PROTECTION OF ASSETS**

Evergreen will make available to employees assets and equipment necessary to conduct Evergreen Healthcare business, including such items as computer hardware and software, billing and medical records in both hard copy and electronic formats, fax machines, office supplies, copy machines and various types of medical equipment. Employees should use these assets in a prudent and effective manner. Evergreen property should not be used for personal reasons or be removed from our facilities without appropriate approval.

## **ADDITIONAL STANDARDS**

Evergreen Healthcare has adopted a number of other organization-wide policies and procedures. Employees may obtain copies from the Sharepoint intranet site. There may also be additional standards and policies that are applicable to particular departments, and copies may be obtained from supervisors, managers or directors in those departments. Evergreen is especially committed to ensuring that coding, billing and submission of claims to Medicare, Medicaid and other third-party payors be appropriate, accurate and in compliance with applicable laws and regulations. This includes billing only for services and care provided, according to medical necessity guidelines.

*These Standards of Conduct apply to **ALL** employees, including supervisors, managers, directors and administrators. They also apply to temporary and contract employees, volunteers and, where practical, to independent contractors and physicians on the Medical Staff.*

*These standards are not intended to cover every situation that may be encountered, and employees should comply with all applicable laws and regulations whether or not specifically addressed in this document. Questions about the existence, interpretation or application of any law, regulation, policy or standard should be directed to an employee's supervisor, vice president or to the Corporate Compliance Officer.*

*Failure to comply with this Code of Conduct or to conduct business in an honest, ethical, and reliable manner can result in civil fines or criminal penalties against Evergreen and its employees and/or corrective action by Evergreen, up to and including termination.*

*Supervisors, managers, and directors are responsible for ensuring that their employees receive a copy of this Code and participate in any mandatory training related to Corporate Compliance. Compliance with the Code of Conduct will be a factor in evaluating the performance of Evergreen employees.*

## **CONTACT INFORMATION**

Kathy Gilles,  
Corporate Compliance & Privacy Officer  
Phone: 425.899.2011  
[kgilles@evergreenhealthcare.org](mailto:kgilles@evergreenhealthcare.org)

## **COMPLIANCE HOTLINE**

Phone: 425.899.5599  
[Compliance@evergreenhealthcare.org](mailto:Compliance@evergreenhealthcare.org)

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# ATTESTATION

I attest that I have received, read and understood the Standards outlined in Evergreen Healthcare's Code of Conduct. I agree to abide by these standards and participate in mandatory compliance training as a condition of my employment at Evergreen Healthcare.

\_\_\_\_\_  
Printed Name

\_\_\_\_\_  
Employee Number

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Date Signed

***Return signed attestation to Corporate Compliance at MS #115.***



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