

# Froedtert Health

## Code of Business Conduct

Good Compliance Sense  
Makes Good Business Sense

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*Please note that the Code of Business Conduct does not create any contract of employment, express or implied, between Froedtert Health or any of its affiliated organizations and any individual.*

# **Froedtert Health Compliance Contact Information**

## **Corporate Compliance Department Main Number**

414-805-2895

## **Confidential Compliance Hotline**

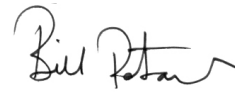
414-259-0220

## **Internet Compliance Email Address**

[comphotl@froedterthealth.org](mailto:comphotl@froedterthealth.org)

**Dear Colleague:**

Enclosed you will find Froedtert Health's Code of Business Conduct. The Code of Business Conduct supports the health system's mission and values and is a critical component of the organization's overall Compliance Program. It also provides guidance to make sure that we perform our jobs in an ethical and legal manner. The success of our organization and our Corporate Compliance Program will require the support and commitment of each of us so that we can continue to fulfill our mission to our patients.

A handwritten signature in black ink, appearing to read "Bill Petasnick". The signature is fluid and cursive, with a large initial "P" and a long, sweeping underline.

William D. Petasnick  
President and CEO of Froedtert Health

### ◆ Enforcement and Disciplinary Actions

**I may be subject to corrective and/or legal actions if I do not follow laws and Froedtert Health Policies that apply to my job and my job responsibilities.**

All Froedtert Health staff must carry out their job duties as stated in organizational and department policies and as required by law. If an individual violates any applicable laws and/or Froedtert Health policies and procedures, he or she may be subject to disciplinary and/or legal action. The specific action will depend on the nature and severity of the violation, and will be consistent with Froedtert Health Human Resources Policies, medical staff bylaws and/or contractual obligation.

### ◆ Physician Relationships

It is important that those staff members who interact with physicians are aware of the requirements of laws, regulations and policies that address relationships between facilities and physicians. This knowledge is especially important if you have a role in making payments to physicians for services rendered, leasing space, recruiting physicians to the community or arranging for physicians to serve in leadership positions in facilities. Any business arrangement with a physician must be in writing and must be reviewed and approved by the Froedtert Health Legal Department.

## ◆ Response to Internal and External Investigations

**I am committed to cooperating with all internal and external investigations in an efficient and professional manner. I know to seek immediate guidance from my supervisor or the Compliance Department if contacted about/during an investigation.**

Internal Investigations: Individuals are expected to cooperate with all internal investigations, audits or reviews related to compliance with the laws or organizational policies.

External Investigations: Froedtert Health will respond appropriately to any authorized government investigation, asserting all protections afforded by law. Froedtert Health believes that it is in the mutual interests of everyone involved that governmental inquiries be addressed to, and handled by, a leader and Corporate Compliance, or legal counsel designated by Froedtert Health. If a staff member is presented with a letter, subpoena or other legal document, or if someone from a governmental agency comes to a department, the staff member should immediately contact the Compliance Department.

## ◆ Discrimination and Harassment

**I will treat all people equally and fairly and will not harass or discriminate against another individual.**

Froedtert Health is committed to an equal opportunity work environment where all staff members are treated with dignity, fairness and respect. We are further committed to providing a work environment that is free from discrimination or harassment of any kind. Any staff member who feels he/she has been subjected to discrimination, harassment or intimidation should immediately report the incident to his or her supervisor, manager, director or vice president and/or to the Human Resources Department.

# CODE OF CONDUCT

## Introduction

The Code of Business Conduct is a set of rules that describe how all people employed or working with Froedtert Health and its affiliates conduct business. These rules help you to know that you are doing the right thing.

Froedtert Health expect staff, and those organizations we do business with, to use these rules of behavior when making decisions and when doing their daily work or duties for Froedtert Health.

This Code of Conduct is general, which means you may need to read Froedtert Health policies and procedures to get more details. You may find yourself in a situation that is not covered in this Code of Conduct. Therefore, if you have any questions or concerns about a situation, an activity or what you are reading in the Code, you should contact the Froedtert Health Compliance Department.

In this Code, you will read about the following topics:

- Compliance with the Law
- Conducting Business Practices with Respect, Honesty and Integrity
- High Quality Patient Care
- Protecting Patient Confidentiality and Privacy
- Protecting Confidentiality of Business Information
- Gifts or Tips
- Giving Free Supplies, Equipment or Services
- Proper Use of Company Assets
- Environment and Safety
- Background Checks
- Emergency Treatment
- Billing and Claims
- Retaliation
- Conflicts of Interest
- Compliance Education and Training
- Reporting Compliance Concerns
- Response to Internal and External Investigations
- Discrimination and Harassment
- Enforcement and Disciplinary Actions

## ◆ Compliance with the Law

**I will follow all laws, rules, regulations, policies and procedures that apply to me and my job duties.**

Everyone must follow the laws, rules, regulations, policies and procedures that apply to what they do. Just like outside of work there are traffic laws you must follow, such as stopping at a stop sign, healthcare also has rules and laws that must be followed. These rules were written to keep you, others who work for Froedtert Health and our patients safe. An example of a regulation we must follow is that all staff must wash their hands after each contact with a patient. Froedtert Health does not expect staff to know and understand every law, rule and regulation. However, you should know when to ask advice from a Froedtert Health leader or the Compliance Department. If you are unsure of what to do in any situation, ask before you act.

## ◆ Conducting Business Practices with Respect, Honesty and Integrity

**I will do my job duties honestly, with respect and integrity.**

Everyone working at, or for, Froedtert Health is expected to do the right thing. This includes being honest with, and respectful to: patients, direct reports, leaders, business partners, vendors, the general public and one another. Froedtert Health expects that you will not lie, cheat, steal or do anything that would harm or injure the reputation of yourself or Froedtert Health. Treat others the way they would want to be treated, and if you don't know the right thing to do, ask.

## ◆ Reporting Compliance Concerns

**I will immediately report any activities or conduct that I believe violates Froedtert Health standards, policies, laws and/or regulations.**

Anyone, who in good faith, believes that an activity may not be lawful or may not comply with the organization's policies and procedures has a responsibility to immediately report the concern. The concern can be reported to his or her department leader or vice president, or to the Compliance Department. Individuals should raise questions or report concerns through the Compliance Hotline. The Compliance Hotline is available all the time, 24 hours-a-day, 7 days-a-week.

All staff should be aware that the organization has a corporate policy called "Preventing Fraud and Abuse, and Reporting Non-Compliance." This policy outlines the False Claims Laws. It also describes how the government protects individuals who report fraud and abuse. These protections are called the Whistleblower Protections.

## ◆ Retaliation

**I will not retaliate against a patient, staff member or any other person who, in good faith, raises a concern about non-compliance.**

Froedtert Health will not retaliate against a staff member, patient or any other person, who in good faith raises a concern about non-compliance. We intend to do the right thing, and we want our staff members, patients, medical staff members, business partners, vendors or any other individual to tell us when they think we are not doing the right thing. We want to investigate and make changes if appropriate.

## ◆ Conflicts of Interest

**I will disclose any possible or potential conflicts between my personal interests and the interest of the organization.**

All relationships and decisions must be in the best interest of our patients and the organization. We should never make decisions that result in our financial benefit or our immediate family members' financial benefit. All staff members should report potential conflicts of interest to the Corporate Compliance Department.

## ◆ Compliance Education and Training

**I am committed to attending and/or completing all mandatory and assigned compliance training and education.**

We want our staff to know the rules and policies for their role so they do the right thing. Staff is required to attend and/or complete all mandatory compliance education that is expected of/assigned to them.

## ◆ Billing and Claims

**I will accurately and appropriately document and bill for the services provided by me or my department.**

Medicare and Medicaid have requirements and obligations that must be met in order for healthcare providers to bill them for health-related services. The requirements promote high-quality and safe patient care, and help to make sure that providers are not inappropriately or incorrectly billing them for services. The government uses the terms fraud and abuse.

“Fraud” is a willful or intentional act. Examples of fraud in healthcare are:

- Billing for services and/or supplies not provided
- Altering forms and/or receipts in order to receive a higher payment amount
- Duplicating billings that includes billing the Medicare program and the beneficiary or Medicaid, or some other insurer in an effort to receive payment greater than the amount allowed
- Offering, paying, soliciting or receiving bribes, kickbacks or rebates, directly or indirectly, in cash or in kind, in order to induce referrals of patients or the purchase of goods or services that may be paid for by Medicare, Medicaid or other government program
- Billing a person who has Medicare coverage for services provided to another person who is not eligible for Medicare coverage
- Completing certificates of medical necessity (CMN) for patients not personally and/or professionally known by the provider
- Billing for procedures over a period of days when all of the treatment occurred during one visit (e.g., split billing schemes)

“Abuse” describes practices that, either directly or indirectly, result in unnecessary cost to the Medicare or Medicaid program. Abuse appears quite similar to fraud except it may not be willful or intentional. Some examples of abuse are:

- Charging in excess for services or supplies
- Providing medically unnecessary services or services that do not meet professionally recognized standards
- Billing Medicare based on a higher fee schedule than for non-Medicare patients
- Submitting bills to Medicare that are the responsibility of other insurers under the Medicare secondary payer (MSP) regulation

## ◆ High Quality Patient Care

**I will provide safe and high quality care to our patients.**

Froedtert Health strives to assure that the services provided at the hospitals and clinics meet or go above acceptable levels of quality and patient safety. The organization and our staff are committed to providing quality care to our patients. Everyone should treat patients with respect and dignity and provide care that is necessary and appropriate. Staff do not discriminate (because of race, religion, national origin, ability to pay or any other factor) in admitting, transferring or discharging patients, or in the care provided. Care is based on the patient’s healthcare needs.

## ◆ Protecting Patient Confidentiality and Privacy

**I will protect and keep patient information private.**

Froedtert Health collects and stores information about patients’ medical conditions and histories so that we can properly treat each person. We are committed to maintaining the privacy of this sensitive information which includes but is not limited to: patient lists, medical records and billing information. Therefore, no Froedtert Health staff member, medical staff member, vendor or business partner has a right to look at, access, use or share any patient information other than what is necessary to perform his or her job duties.

## ◆ Protecting Confidentiality of Business Information

**I will protect and keep confidential business information private.**

Froedtert Health has information about strategies and operations that are valuable to the organization. Confidential business information includes, but is not limited to: pricing and cost data, information pertaining to acquisitions, affiliations and mergers, financial data, research data, strategic plans, marketing strategies and contract information. Every staff member has an obligation to protect and safeguard this information in a way that will prevent others from knowing it.

## ◆ Gifts or Tips

**I will not accept money or other things of value from our patients, patient family members, vendors and/or others.**

All Froedtert Health staff should use good judgment when accepting gifts. The offer of money, gifts, services and entertainment should never influence a decision, selection of a vendor, or affect the care of a patient. Staff must never accept cash. Staff should only accept gifts of nominal value or that can be shared with their department and/or co-workers. Nominal gifts include: flowers, cookies, etc.

## ◆ Giving Free Supplies, Equipment or Services

**I will not attempt to influence patients, governmental officials, medical staff members or any other person with an offer of money, services, supplies or equipment.**

Froedtert Health staff must never offer or give money or gifts to governmental officials. Gifts to medical staff members, vendors, business partners and/or any other person should be of nominal value and should not be given in order to influence them. Free or discounted supplies, equipment or services provided to patients must be in accordance with the organization's charity care policy.

## ◆ Proper Use of Company Assets

**I will protect the organization's equipment, supplies, property and other assets against loss, theft, destruction and misuse.**

Part of the job of every staff member is to keep the costs of healthcare down. One way to assist in doing that is to protect our organization's assets. Staff should only use supplies and equipment for hospital or clinic business, never for personal use. We must make sure that we secure things of value. We must take precautions so our equipment and supplies are not lost, broken, stolen and/or misused.

## ◆ Environment and Safety

**I will work to provide an environment where the health and safety of our patients and staff come first.**

Our organization promotes an environment that protects patients and staff from infection, injuries and illnesses. Staff are expected to have a positive attitude about safety and to attend safety training required for their job duties. We focus on creating processes and practices that encourage safety and quality. We also support open and honest reporting when events occur, so that we can prevent the same incident from happening again.

## ◆ Background Checks

**I understand that Froedtert Health will conduct formal background and credentialing checks on all staff, medical staff members and certain vendors/contractors.**

To reduce risk and promote a safe environment for patients, staff members and our organization, Froedtert Health strives to only hire or contract with those that share the same values and integrity. As a result, an appropriate background check is conducted before staff and medical staff members start working. We do not employ or enter into contracts with individuals or entities that cannot participate in federal or state health care programs. Staff, medical staff members, vendors and contractors must obtain and maintain all appropriate licensure and/or certifications required for their job responsibilities or contracts. They are also required to report any changes in their status according to corporate policy.

## ◆ Emergency Treatment

**I will provide a medical screening and treatment to all persons who are seeking emergency medical treatment, regardless of ability to pay.**

- We provide an emergency medical screening exam and necessary stabilization to all patients, regardless of their ability to pay.
- We will not delay the medical screening and necessary treatment to stabilize the patient in order to seek financial and demographic information.
- We do not admit, discharge or transfer patients with emergency medical conditions simply based on their ability or inability to pay. Patients are only transferred to another facility at the patient's request or if the patient's medical needs cannot be met at the facility.