

**Froedtert**

*Good Compliance Sense  
Makes Good Business Sense*

# **Code of Business Conduct**

**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

Froedtert Anonymous Compliance Hotline Phone

414-259-0220

Compliance Hotline E-mail Address

comphotl@froedtert.com

### **A message from Cathy Jacobson to the employees, providers, business partners and colleagues of Froedtert Health:**

As an organization, we are committed to honest and ethical behavior and to conduct our business with integrity. Throughout our history, as we have served our patients and our community, we have earned a reputation for honor and integrity. Our business is built on this trust and this reputation. It's about sustaining a place where we are all proud to work; it's about who we are as an organization.

The practice of behaving honestly, ethically and with integrity is an individual responsibility. We make decisions about how to conduct ourselves every day as we go about our work. Each of us is accountable for the actions that we decide to take.

To help you with the legal and ethical questions you may encounter in your daily work, we have prepared the Froedtert Health Code of Business Conduct. The organization's corporate policies, coupled with the Code of Business Conduct, sets the standards and expectations to help us all do the right thing.

With your help, I am confident that Froedtert Health will continue to be an outstanding corporate citizen in every community we serve and our reputation for integrity will endure. Thank you for joining me in this effort.

Sincerely,



Cathy Jacobson

President and CEO, Froedtert Health

## Introduction

The purpose of the Code of Business Conduct (Code) is to set forth a code of ethical behavior designed to help all persons and businesses associated with Froedtert Health to perform their daily activities in accordance with the organization's ethical standards and applicable federal, state, and local laws, rules and regulations. We believe acting ethically and responsibly is the right thing to do for our community and the many stakeholders we serve.

Froedtert Health expects staff and those organizations we do business with to use these rules of behavior as a foundation when making decisions and performing their daily work or duties for or on behalf of Froedtert Health. The nature of this Code is not meant to cover all possible topics and situations that may occur. It is designed to provide a frame of reference against which to measure activities. The Code is general, which means you will need to read Froedtert Health policies and procedures to get more details. You may find yourself in a situation that is not covered in the Code. 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.

For the purposes of this Code, references to "Froedtert Health" mean Froedtert Health and its Affiliates. "Employee" or "Staff member" means an employee of Froedtert Health or an employee of one of its Affiliates.

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

- Accuracy, Retention, and Destruction of Documents and Records
- Background Checks
- Billing and Claims
- Compliance Education and Training
- Compliance with the Law
- Conducting Business Practices with Respect, Honesty and Integrity
- Conflicts of Interest
- Discrimination and Harassment
- Emergency Treatment
- Enforcement and Corrective Actions
- Environment and Safety
- Gifts or Tips
- Giving Free Supplies, Equipment or Services
- High Quality Patient Care & Service
- Physician Relationships
- Proper Use of Company Property and Assets
- Protecting Confidential Information
- Reporting Compliance Concerns
- Response to Internal and External Investigations
- Retaliation

## Conducting Business Practices with Respect, Honesty and Integrity

### I will perform 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, co-workers, 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.

*Code of Corporate Ethics Policy FH-COM.032*

## Compliance with the Law

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

Everyone must follow the laws, rules, regulations, policies and procedures that apply to their individual jobs. Just like the laws in the community that you must follow, such as traffic laws, health care is no different. These rules are in place to keep you, your coworkers, our patients and customers safe. An example of a rule we must follow is that staff must not steal from our patients, other staff members or the organization. Staff are not expected to know every single health care-related law, but you are expected to know, understand and follow the laws that are relevant to your specific job duties. It is also important that all staff members know where to locate Froedtert Health policies and procedures and to ask for assistance if they need help finding them. If you are ever unsure about whether an action is in compliance with a law or policy, discuss it with your leader or the Compliance Department. If you are unsure of what to do in any situation, ask before you act.

## Background Checks

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

To reduce risk and promote a safe environment for patients, customers, 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, providers, vendors and contractors 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, providers, 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.

*Background and Exclusion Checks Policy FH-HR.028*

## Education and Training

### I will attend and/or complete all mandatory training and education in the required timeframe.

To be competent and successful in your role and to carry out your job duties in a compliant manner, it is critical to take all education and training seriously and to complete it within the timeframe required. Staff are responsible to ask for clarification if they do not understand the education or what is required of them.

*Attendance at Education Programs Policy FH-HR.092*

*New Employee Orientation Policy CP4.0007*

## 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 is illegal, unethical or does not comply with the organization's policies and procedures is responsible for immediately reporting the concern. Failure to report suspected violations or non-compliance can be viewed as misconduct and may warrant corrective action up to and including termination of employment. These matters must be reported to the department leader, vice president or to the Compliance Department without delay.

*Compliance Reporting, Hotline and Non-Retaliation Policy FH-COM.025*

**Froedtert Anonymous Compliance Hotline Phone: 414-259-0220**

**Compliance Email Address: [comphotl@froedtert.com](mailto:comphotl@froedtert.com)**

## Retaliation

**I will not retaliate against a patient, staff member or any other person who, in good faith, raises a concern about noncompliance or unethical behaviors or actions.**

Froedtert Health leaders and staff will not retaliate against staff, colleagues, patients or any other person who raises a concern about non-compliance or unethical activities. If someone feels as though they have been retaliated against, it is their duty to immediately report it to the Compliance Department or Senior Leadership.

*Compliance Reporting, Hotline and Non-Retaliation Policy FH-COM.025*

## 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 internal investigations, audits or reviews related to compliance with the laws or organizational policies.

External Investigations: Froedtert Health will cooperate and 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 or is contacted in some way, the staff member should immediately contact his or her manager or the Froedtert Health Legal Department.

## Protecting Confidential Information

**I will protect and secure all patient, staff and other confidential business information.**

Patient Information: Froedtert Health is committed to maintaining the privacy and security of our patient's information which includes, but is not limited to verbal, written or electronic information including patient lists, medical records, appointment information, billing information, etc. Therefore, no Froedtert Health staff member, medical staff member, student, volunteer, vendor, contractor or business partner has a right to access, use or disclose any patient information other than what is necessary to perform his or her job duties. Froedtert Health has no tolerance for inappropriate access, use or

disclosure of confidential information when it is done with deliberate disregard or ignorance of Froedtert Health Policies and/or regulatory requirements.

Other Confidential Business Information: Other confidential business information includes, but is not limited to staff employment, benefits or payroll information, pricing or cost data, information pertaining to acquisitions, affiliations and mergers, financial data, research data, strategic plans, marketing strategies, contract information, or any other proprietary information, or information not publicly available that belongs to Froedtert Health or its business operations. Froedtert Health staff have no rights or ownership to Froedtert Health confidential information. Staff that are authorized to have access to this type of information are required to protect and safeguard it.

Froedtert Health has the right to monitor the access, use and disclosures of its confidential information and systems at any time and without notice.

*Confidentiality Policy FH-COM.062 (Confidentiality Agreement attached to policy)*

## High-Quality Patient Care and Service

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

Froedtert Health and its staff are committed to providing quality, safe, compassionate and medically appropriate care to the patients that we serve. Care is centered around the patient's needs and their wishes. Staff must treat patients and families with dignity and respect and will not discriminate against patients (e.g. because of race, religion, national origin, ability to pay, disability or any other factors) during any phase of the care and services provided, including the scheduling, admitting, transferring or discharge process.

## 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 that present to one of our hospital emergency departments seeking emergency treatment, 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.

*Emergency Medical Treatment and Active Labor Act (EMTALA) Policies CPM.0150 (FMLH), 80100-121 (CMH), SJH.ADM.019 (SJH)*

## Environment and Safety

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

Froedtert Health is committed to promoting an environment and creating processes that protect patients, visitors and staff from infection, injury and illness. Staff are expected to support a culture of safety, attend safety training required for their job duties and to follow Froedtert Health policy and regulatory requirements. Froedtert encourages and supports open and honest reporting when events or any unsafe condition or practice is identified. The goal is to prevent, detect and mitigate any situation or practice that is not safe or compliant.

## 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 fostering an environment of equality where all individuals are treated with dignity, fairness and respect. We are further committed to providing an environment where all individuals are protected from discrimination on the basis of race, color, national origin, age, disability, and sex; including discrimination based on pregnancy, gender identity and sex stereotyping. Sexual harassment and intimidation is prohibited. Any individual who feels he/she has been subjected to discrimination, harassment or intimidation should immediately report the incident to a leader, Human Resources or the Corporate Compliance Hotline.

*Harassment Free Workplace Policy FH-HR.018*

## 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.

## Conflicts of Interest

**I will disclose the existence and nature of any actual or possible conflicts of interest 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. Never influence or make decisions that result in our own personal financial benefit or our immediate family members' financial benefit.

This can occur when a staff member has authority to negotiate, recommend or influence a business decision. All staff members should report potential conflicts of interest to the Corporate Compliance Department.

*Conflict of Interest for Froedtert Health Employees (excluding Employed Providers) Policy FH-COM.045, Conflict of Interest for Providers Policy FH-COM.005, and Conflict of Interest and Excess Benefit Transactions Policy FH-COM.001*

## Giving Free Supplies, Equipment or Services

**I will not attempt to influence patients or any other person with an offer free supplies, services or equipment.**

Staff must follow corporate policy prior to any consideration of free or discounted supplies, services or equipment to patients. Giving free supplies, equipment or services to patients can be viewed by the government as an incentive or a way to influence the patient to use only our health care services.

*Free Services or Supplies for Patients Policy FH-COM.034*

## Gifts/Business Courtesies to and from External Organizations/Individuals

**I will not solicit or accept money, gifts, business courtesies or other items of value from our patients, patient family members, external organizations/individuals and/or others.**

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 directly, but instead direct those contributors to the respective hospital foundation. Staff may only accept tangible gifts from patients or patient family members when they are of nominal value or when they can be shared with their department and/or coworkers. Examples of nominal gifts include flowers, cookies, etc. Staff agree to follow corporate policy as it relates to the acceptance of gifts or anything of value from an external organization/individual. Staff must never offer or give money or gifts to governmental officials. Any form of gifts or nonmonetary compensation for providers must receive prior approval by the Compliance Department.

*Gifts/Business Courtesies to and from External Organizations/Individuals Policy FH-COM.022*

*Gifts/Nonmonetary Compensation to Physicians and Medical Staff Incidental Benefits Policy FH-COM.080*

## Billing and Claims

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

Froedtert Health takes great care to assure that all billings to the government, third-party payors and patients are accurate and conform to all applicable federal and state laws and regulations. We prohibit any employee or agent of Froedtert Health from knowingly presenting, or causing to be presented, claims for payment or approval that are false, fictitious or fraudulent. Strict federal and state laws and regulations govern third-party billing of our insured patients. Froedtert Health is committed to full compliance with federal health care program requirements, including preparing and submitting accurate claims consistent with such requirements. We monitor and verify that claims are submitted accurately and appropriately. Some examples of compliant billing practices are:

- Submitting charges that accurately represent the care, services and supplies provided to patients.
- Including written documentation in the Legal Health Record that supports the services they provide and bill for.
- Claims are correctly prepared and submitted in accordance with regulations, organizational and departmental policy whether the activities are performed by Froedtert Health staff or an outsourced vendor.
- Monitor billing activities to detect any deliberate or accidental occurrences of incorrect billing.

All staff should be aware of and refer to the Billing Compliance Policy that is applicable to their business. These policies outline the False Claims Act and describe how the government protects individuals who report fraud and abuse.

*Hospital and Professional Billing Compliance Policies FH-COM.035 and FH-HIM.007*

## Proper Use of Company Property and 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 health care down. One way to assist in doing that is to protect our organization's assets. Staff should only use supplies and equipment (as well as electronic technology, storage and applications) for Froedtert Health business and never for personal use or benefit. We must make sure that we secure things of value and take precautions so our equipment and supplies are not lost, stolen, compromised or misused.

## Accuracy, Retention and Destruction of Documents and Records

**I am committed to both retaining and maintaining timely and accurate patient and business records.**

Each staff member is responsible for the integrity and accuracy of our organization's documents and records, not only to comply with regulatory and legal requirements, but also to make sure records are available to support our business practices and actions. No one may alter or falsify information on any business or patient record or document. Records must be retained and destroyed in accordance with the law and our record retention policies.

*Record Retention Policy (See Facility Policies)*

## Enforcement and Corrective Action

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

All Froedtert Health staff must carry out their job duties in accordance with Froedtert Health standards of staff conduct and performance as stated in policies and procedures and as required by law. Staff members who violate a law or Froedtert Health standards, policies and/or procedures is subject to corrective action and potential external reporting as required under state and/or federal guidelines/rules. Illegal actions may involve law enforcement and/or legal action as applicable. The specific actions taken will depend on the nature and severity of the violation.

*Corrective Action Policy FH-HR.001*

## Summary

Abiding by the Code of Business Conduct, Froedtert Health Policies and Procedures, as well as state and federal laws, is critical to maintaining a safe and thriving environment. Seriously consider the manner in which you conduct yourself at work, and always choose to do the right thing by our patients, our staff and the organization.

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