

# Code Of Corporate Ethics

## description

Code of Corporate Ethics, Compliance, Code of Conduct, Staff Behavior, Staff Conduct, Patient Rights, Conflict Resolution

## Policy Number

FH-COM.032

## Supersedes

CPA.0096, 80100-071

## Purpose

To set forth a code of ethical behavior designed to help improve patient outcomes by respecting each patient's rights and conducting business in an ethical manner.

## Definitions

A. Froedtert Health affiliate means for purposes of this policy: Froedtert Memorial Lutheran Hospital, Inc.; Community Memorial Hospital of Menomonee Falls, Inc.; St. Joseph's Community Hospital of West Bend, Inc.; Froedtert & The Medical College of Wisconsin Community Physicians, Inc., West Bend Surgery Center, LLC, and Froedtert Surgery Center, LLC. Any other entity that becomes controlled by FH after adoption of this policy also may be considered an affiliate.

B. Staff of a Froedtert Health Affiliate – For the purposes of this policy, means individuals employed by a Froedtert Health Affiliate or credentialed members of the medical staff of a Froedtert Health Affiliate.

## Policy

## **General Principles**

- A. Everyone working at, or for a Froedtert Health Affiliate has the responsibility to act in a manner consistent with the ethical principles outlined in this policy.
- B. Everyone working at, or for a Froedtert Health Affiliate must perform their duties with integrity, honesty, fairness, and diligence; and adhere to the highest principles of dignity and respect.
- C. Everyone working at, or for a Froedtert Health Affiliate will follow all laws, rules, regulations, policies and procedures that apply to their job duties.
- D. Everyone working at, or for a Froedtert Health Affiliate will treat individuals with courtesy, honor and respect. Individuals shall not be harassed or discriminated against on the basis of: race, color, national origin, age, disability and sex, including discrimination based on pregnancy, gender identity and sex stereotyping.
- E. Everyone working at, or for a Froedtert Health Affiliate will perform and fulfill all duties consistent with the principles, values and obligations established in our Code of Business Conduct
- F. Staff of a Froedtert Health Affiliate will perform and fulfill all duties consistent with the principles, values and obligation established in our Rules of Conduct/Corrective Action Policy.
- G. Staff of a Froedtert Health Affiliate will declare any conflicts of interest and make appropriate arrangement to assure that those with a material interest are not involved in the decision making process.
- H. Reporting business performance should be undertaken in such a way that senior leadership is fully and properly informed of the business' actual performance, risks and opportunities in a timely manner.
- I. Everyone working at, or for a Froedtert Health Affiliate will promptly report all ethical or compliance violations to the Froedtert Health Compliance Office.

## **Patient Care Principles**

- A. Everyone working at, or for a Froedtert Health Affiliate will respect and honor the rights, dignity, well being, and privacy of all patients.
- B. Everyone working at, or for a Froedtert Health Affiliate will respect and protect the emotional vulnerability of all patients and refrain from encouraging, developing, fostering, or maintaining intimate or other inappropriate personal employee/patient relationships.
- C. Everyone working at, or for a Froedtert Health Affiliate will protect all patients from any form of abuse, neglect, or exploitation.
- D. Everyone working at, or for a Froedtert Health Affiliate will maintain the highest level of patient confidentiality at all times.
- E. Everyone working at, or for a Froedtert Health Affiliate will encourage and include, whenever possible and to the extent possible, the family or designated others in the treatment of the patient.
- F. Everyone working at, or for a Froedtert Health Affiliate recognizes and accepts the autonomy of patients and the right of those with capacity to make their own health care decisions, including refusal of treatment.

- G. Everyone working at, or for a Froedtert Health Affiliate, in accordance with applicable policies and procedures, will honor and respect patients advance directives and durable powers of attorney regarding their health care wishes and decisions.
- H. Everyone working at, or for a Froedtert Health Affiliate will be sensitive, responsive, and respectful in the care of individuals who are at the end of life by fostering the individual's comfort and dignity while addressing the treatment of primary and secondary symptoms, effectively managing pain and responding to the individuals' and their family's specific psychosocial, spiritual, and cultural needs and concerns.
- I. Froedtert Health will respect the right of all patients and staff to refuse to participate in any research without first obtaining legally adequate consent and make sure that care is not compromised for refusal to participate.
- J. When a patient makes a request for a referral to a physician, or other healthcare service provider, such as home health, staff should provide a list of several physicians/providers who are qualified in the specialty for which the referral is sought. This will avoid the appearance of favoritism or potential influence over the decisions of the patients.
- K. Everyone working at, or for a Froedtert Health Affiliate will provide treatment in the most efficient and effective manner possible and refrain from unrealistic lengths of stay or inappropriate provisions of services to our patients.
- L. Everyone working at, or for a Froedtert Health Affiliate will make decisions about admissions, discharges, and transfers of patients with purely the best interest of the patient in mind.
- M. Everyone working at, or for a Froedtert Health Affiliate will make sure that the integrity of clinical decision making shall be protected and not compromised regardless of any consideration related to the compensation between the facility, its leadership, physicians, and/or any other business/vendor.

### **Administrative Principles**

- A. Froedtert Health recognizes our position of public trust and will represent our services and capabilities fairly and accurately to the public.
- B. Froedtert Health will advise patients at their request about their financial responsibility to the hospital and/or clinic, if any, and provide assistance to them in accessing possible resources, while never denying a medical screening exam for emergency medical conditions.
- C. Froedtert Health will perform all billing and reimbursement activities with integrity, accuracy and in compliance with all laws, regulations and organizational policies and procedures.
- D. Froedtert Health will refrain from contractual agreements with organizations or individuals where there is a potential for conflicts of interest.
- E. Froedtert Health will refrain from doing business with organizations and individuals that do not share the same values and integrity as we have. As a result we will not do with business with any businesses or individuals that can not participate in federal or state health care programs.
- F. Froedtert Health staff and members of the medical staff, vendors, and contractors must obtain and maintain all appropriate licensure and/or certifications required for their job responsibilities or contracts.

### **Conflict Resolution Principles**

- A. Froedtert Health will respect the right of staff members to not participate in any treatment, procedure, or activity approved by the facility that is in violation of, or in conflict with, their specific and identifiable cultural, religious, or ethical beliefs.
- B. Froedtert Health will promptly and courteously investigate and resolve all complaints from staff, our patients, the

public, or others regarding any aspect of our service delivery.

- C. Froedtert Health will not retaliate against a patient or staff member or any other person who, in good faith, raises a concern about non-compliance.
- D. If an individual feels his/her concern has not been addressed, he/she should direct these concerns to any member of the Senior Leadership Team and/or the Vice President, Chief Compliance and Risk Officer.
- E. If the individual continues to feel his/her concern is not being properly addressed by internal parties, he/she has the right to report his/her concerns to the appropriate government agency.
- F. Staff of a Froedtert Health Affiliate will accept no gifts from patients, their families or friends, vendors, or from any other source associated with the performance of our duties that has any potential to influence or creates a perception of influence.

### **Other Principles**

- A. Outside activities of staff members are generally a personal matter. In general, staff members are encouraged to participate and accept leadership roles in professional and educational groups, as well as community, cultural and charitable activities. Whether such activities are subject to indemnification by Froedtert Health depends upon Wisconsin law and the individual Froedtert Health Affiliate's indemnification policy. When a staff member serves as a director of an entity at the request of Froedtert Health, any fees for such service accrue to Froedtert Health. Other directors' fees may be retained as personal income.
- B. Borrowing money or items from vendors, consultants or any other individuals or organizations doing business with Froedtert Health is strictly prohibited. Personal borrowing needs of staff should be confined to banks or other financial institutions.
- C. Froedtert Health encourages voluntary support of political activities and candidates for public office. However, the use of Froedtert Health funds or other Froedtert Health property as donations or to engage in such activities for such purposes is strictly prohibited.
- D. Froedtert Health's communication with elected officials regarding public policy matters is regulated by the state Government Accountability Board, the federal Lobbying Disclosure Act and the Internal Revenue Service. Froedtert Health resources, including staff time and the e-mail system, may be used for advocacy or lobbying purposes without authorization from the Froedtert Health President, CEO or Director of Government Relations. Staff members authorized to use Froedtert Health's e-mail or other property for these purposes must report such activity to the Director of Government Relations.

## **Issuing Authority**

FH Corporate Policy Committee

## **Distribution**

Froedtert Health

## category

Compliance,