



STANDARDS OF CONDUCT POLICY

Succeed with Integrity

Norton Healthcare's purpose is to provide quality health care. By working at Norton Healthcare we make a personal commitment to serve the people in the Louisville region and at our facilities in a manner consistent with the faith heritage of our founding organizations. It's a commitment we uphold with great pride. Our patients trust us because they know we are committed to them.

As Norton Healthcare employees, we are responsible for upholding a culture of ethics and integrity. This means acting responsibly in our daily activities with the high standards we set for our business practices. Norton Healthcare believes that its behavior as a leader in health care and in the community should reflect a commitment to the values set forth in these *Standards of Conduct*.

The *Standards of Conduct* contained in this policy express our commitment to quality and caring and provide guidance to ensure our service is performed in an ethical and legal manner. They are standards of integrity...trustworthiness... honesty... fairness... respect...and teamwork.

If you encounter a situation that does not feel right or if you suspect a violation of the *Standards of Conduct*, immediately consult with your supervisor, a member of management or the vice president of Compliance, or call the Compliance Hotline, **(888) 441-8279**.

Employees are encouraged to report wrongdoing and may remain anonymous when calling the hotline. No acts of retaliation or retribution will occur against anyone acting in good faith who reports a perceived problem or concern.

The *Standards of Conduct* provide a framework to guide our behavior in supporting the mission and values of Norton Healthcare.

Mission

Norton Healthcare's purpose is to provide quality health care to all those we serve, in a manner that responds to the needs of our communities and honors our faith heritage.

Vision

We will be the most comprehensive, strongest and preferred health care organization, setting the standard for quality and caring.

Values

At Norton Healthcare, we will:

- Respect every person
- Set the standard for quality and caring
- Continually improve care and service
- Demonstrate stewardship of resources
- Accept accountability for results
- Succeed with integrity

Our Faith History

Norton Healthcare's faith history includes founding organizations and other faith communities: Episcopal Church, United Methodist Church, United Church of Christ, Presbyterian Church and Roman Catholic Church.



STANDARDS OF CONDUCT

Compliance with all Laws and Regulations

All of Norton Healthcare's employees must comply with all federal, state and local laws and government regulations, and must immediately and directly report to Norton Healthcare's Compliance Officer any actual or perceived violation of this Standards of Conduct or of the Compliance Program.

Introduction

Norton Healthcare is committed to conducting its business lawfully and ethically. All employees, volunteers, agency employees, medical staff and vendors must maintain high standards of legal and ethical conduct. The intent of Norton Healthcare's *Compliance Program* is to protect Norton Healthcare's tradition of strong moral, ethical and legal *Standards of Conduct*.

Standards of Conduct

Compliance with all Laws and Regulations

Norton Healthcare employees, volunteers, agency employees, medical staff and vendors must follow all federal, state and local laws for the health care industry as well as Norton Healthcare's policies and procedures.

Legal Matters

Antitrust

Norton Healthcare employees may not take part in unfair practices. Examples of unfair practices are price fixing, supplier or customer boycotts and bribery.

Anti-kickback

Norton Healthcare employees may not offer a payment in exchange for referring a patient to a Norton Healthcare facility.

Billing and False Claims

Norton Healthcare will only bill for care and services provided and ordered for our patients. We will not do anything that violates the federal and state false claims laws and regulations. Examples of false claims are billing for services not rendered or known to be false or medically unnecessary.

Emergency Care

Norton Healthcare must treat all individuals who have emergency medical conditions and may not delay medical screening in order to ask about method of payment.

Patient Privacy/HIPAA

The Health Insurance Portability and Accountability Act (HIPAA) includes rules concerning patient privacy. HIPAA may fine health care providers who misuse patient health information. Norton Healthcare requires that employees access information only when needed to treat and care for our patients.

Using Norton Healthcare Resources Properly

Media Matters

Norton Healthcare believes in answering questions from newspapers, television, radio and other news media when information is appropriate for public knowledge. You may not speak on behalf of your facility or Norton Healthcare unless asked to do so by a member of the Marketing and Communications Department. Members of the news media must receive prior approval from the Marketing and Communications Department before visiting any Norton Healthcare facility for the purpose of research, interviews, photography or videotaping. A Marketing and Communications staff member must accompany members of the media while they are at a Norton Healthcare facility.

Political Contributions

Norton Healthcare employees may not contribute or donate Norton Healthcare's funds, products or services to any political candidate. Employees may make voluntary personal contributions with their own money.



Providing Business Courtesies

Norton Healthcare may provide refreshments at on-site locations that are for the convenience of physicians who are treating patients on behalf of Norton Healthcare. Meals and refreshments also may be offered during business meetings.

Research Grants

Norton Healthcare will make sure any funds provided to support health care research are provided to the research study.

Charitable Contributions

All charitable contributions received from vendors must benefit Norton Healthcare. Checks may not be made out to Norton Healthcare employees from vendors.

Government Customers

Norton Healthcare employees may not pay for any meal, refreshment, entertainment, travel or lodging expenses for a government employee.

Time Card Reporting

Employees must complete and submit time sheets accurately.

Accurate Books and Accounts

All transactions must be approved by management and recorded on Norton Healthcare's books.

Avoiding Abuse of Trust

Conflict of Interest

Norton Healthcare employees should avoid conflicts between their personal interests and performance of duties for Norton Healthcare. Employees shall report any conflicts of interest to management.

Acceptance of Business Courtesies

Norton Healthcare employees may accept meals, drinks or entertainment if these items are not asked for, are infrequently provided and are reasonable in amount. A courtesy offered to an employee that has a value in excess of \$50 should be reported to the Compliance Officer.

Confidential Information

Norton Healthcare employees must safeguard all confidential information of Norton Healthcare.

Refraining from Substance Abuse

It is the policy of Norton Healthcare to provide employees and patients with a workplace that is free of unauthorized use of controlled substances and alcohol.

Compliance Hotline

Any Norton Healthcare employee may call the Norton Healthcare Compliance Hotline to report known or suspected violations of the *Compliance Program*; any Norton Healthcare policy, procedure or standard; or any federal or state law. Employees also may call when they are unsure of the proper course of action.

Norton Healthcare Compliance Hotline:

- Operates 24 hours a day, seven days a week
- Is run by an outside organization professionally trained to handle your calls
- Allows employees to file anonymous reports if they choose; no caller identification methods are used
- Provides an identification number to the caller, per incident, for confidential follow-up
- Maintains confidentiality unless the caller indicates it is not necessary for the current situation



Frequently Asked Questions about the Compliance Hotline

What kinds of violations should I report?

You should report any instance in which you are aware of behavior that is illegal or violates the Norton Healthcare *Compliance Program* or any Norton Healthcare policy or procedure.

The following types of violations should be reported:

- Patient rights and care issues
- Privacy rights of employee and patient records
- Health, safety and environmental issues
- Medicare/Medicaid fraud and abuse
- Harassment/discrimination issues
- Substance abuse
- Bribes and kickbacks
- Theft and fraud
- Antitrust Law violations
- Improper accounting and record keeping
- Billing
- Potential criminal violations
- Confidentiality of company information
- Other violations of company policy

What happens when I call the Norton Healthcare Compliance Hotline?

A professionally trained person will answer your questions or take notes based on the information you provide. You may be asked additional questions to gather further information. At the end of your conversation, you will be given a unique identification number so that you may follow up on the situation if you wish.

What happens after my phone call?

The representative who spoke with you will prepare a confidential report based on the notes taken during your conversation. This report is forwarded to the Norton Healthcare Compliance Officer for review, investigation and response. The representative to whom you spoke will be kept aware of the status of the investigation so that it may be given to you if you choose to follow up. You must have your identification number to receive any further information on the situation.

Do I have to give my name?

No, if you choose, you may ask questions or report suspected unethical situations without disclosing your identity. Your phone call is handled by a third-party representative who does not work for Norton Healthcare.

Will I suffer retaliation for making a report?

No. Norton Healthcare relies on you to use these resources to ensure a safe and comfortable environment for all employees and patients. You run no risk of disciplinary action or termination when, in good faith, you report information and attempt to do the right thing.

Are calls ever recorded or traced?

No. Calls to the Compliance Hotline are never recorded or traced.

When can I call?

You may call any time of the day or night, any day of the week. The number is **(888) 441-8279**.



Contact Resources

System vice president, Compliance and Audit	629-8422
Human Resources	629-3696
Legal Department	629-8171
Risk Management:	
Norton Hospital/Norton Medical Pavilion	629-8149
Kosair Children's Hospital	629-3502
Norton Audubon Hospital	636-7118
Norton Brownsboro Hospital	446-8092
Kosair Children's Medical Center	446-8092
Norton Suburban Hospital	899-6938
Physician Services	272-5019
Norton Healthcare Compliance Hotline (anonymous)	(888) 441-8279

Compliance Training and Awareness

Norton Healthcare has a compliance training and awareness program for all employees. Within the first 30 days of employment, all new employees will complete initial training. The goals and objectives of the *Compliance Program* are to familiarize employees with the program and the *Standards of Conduct*.

After initial orientation, all existing employees complete an annual training update. In addition, certain individuals are required to undergo compliance training in areas of compliance risk (e.g., billing, coding, etc.).