

# **Ascension**

# **Standards of Conduct**

A Mission based on values and ethics



**Ascension**

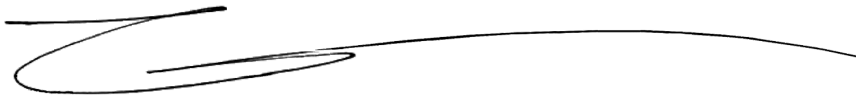
# CEO message

Ascension carries out its healthcare ministry consistent with the Ascension Mission, Vision and Values. Integrity is one of Ascension's Values and the essence of integrity is a workplace in which we follow ethical and legal business practices.

The Standards of Conduct describe the behavior and conduct expected of all associates, medical staff, board and board committee members, and contractors. The Standards of Conduct are intended to help you respond to questions and situations you may encounter in your daily work. Please read it carefully and consider what it says.

No Standards of Conduct can anticipate every question or substitute for each individual's sense of honesty and integrity. If you have questions about the Standards of Conduct or come across any situation which you believe violates the Standards, you should consult your supervisor, the [Ascension Compliance team](#) or the Values Line at **1-800-707-2198** or **AscensionValuesLine.org**. There will be no retaliation for asking questions or reporting possible compliance issues in good faith.

Our commitment to corporate compliance begins and ends with each individual. Thank you for joining us in our shared commitment to the Standards of Conduct.

A handwritten signature in black ink, consisting of a large, sweeping loop followed by a long horizontal stroke that tapers to the right.

**Eduardo Conrado**  
President and Chief Executive Officer  
Ascension

Standards of Conduct

# Table of contents

- Introduction .....4
- Mission, Vision and Values ..... 6
- Standards of Conduct:
  - Relationships with others ..... 7
  - Compliance .....8
  - Associate experience .....9
  - Business ethical practices  
and confidentiality ..... 10
  - Conflicts of interest. .... 11
- Your voice: Where to find help .....12
- Standards of Conduct acknowledgement ..... 14

# Table of definitions

The following words and phrases have the following meanings as used in the Standards of Conduct.

- Contractors**      Third party individuals or organizations with which we do business, such as vendors that provide supplies and services.
- Retaliation**      A harmful action against an associate in response to the associate asking questions or reporting a concern.
- Values Line**      A confidential phone and internet web service for associates to report ethical and legal issues. Reports can be made anonymously.

# Introduction

This document details the Mission, Vision and Values of Ascension; explains the Standards of Conduct we are responsible for practicing; and describes ways for associates to find help and report ethical and legal issues.

## Responsibilities of associates, Medical Staff members, Board and Board Committee members and contractors

The Standards of Conduct apply to all associates, medical staff members, board and board committee members, and contractors. You are expected to:

- Adhere to the Ethical and Religious Directives for Catholic Health Care Services within the institution as a condition for medical privilege and employment (*cf.* ERD n. 5).
- Review and follow the Standards of Conduct, paying particular attention to those Standards of Conduct that apply to your everyday work responsibilities.
- Ask questions when you are uncertain what to do. See page 12 for details on where to find help.

## Responsibilities of leaders

Leaders have a role in receiving and responding to questions and concerns raised by associates and others you lead. How you respond to these questions and concerns is key to others having the trust and confidence to bring important matters to your attention.

You are expected to:

- Serve as a role model for our Mission, Vision and Values by carrying out your responsibilities with the highest degree of personal integrity.
- Clearly communicate to others your expectations for the highest standards of ethical behavior.
- Promote a culture of trust, open communication and respect.
- Hold those you lead accountable for behavior consistent with the Standards of Conduct.
- Encourage others to raise issues and concerns so they can be addressed.
- Respond timely and appropriately to issues and concerns brought to your attention and forward concerns expressed by your staff to [Ascension Compliance](#), Human Resources or other appropriate leaders.
- Support our policy of non-retaliation for anyone who raises issues and concerns in good faith.
- Learn and follow applicable laws and regulations that affect your work.
- Ask for assistance when you are unsure how to respond to an issue or concern.

# Introduction *continued*

## **Responsibilities of the Board and Board Committee members**

Members of the board and board committees have a responsibility to be informed and exercise appropriate judgment to:

- Ensure that legal and ethical business practices expressed in the Standards of Conduct guide the decisions you make on behalf of Ascension.
- Disclose any potential conflict of interest and take appropriate actions to address any situations that may appear to interfere with independent judgment or the duty to serve in the best interest of Ascension.
- Hold senior leadership accountable for effective policies, procedures and internal control systems that address compliance with laws and regulations and promotion of ethical business practices.
- Respond timely and appropriately to issues and concerns brought to your attention.

The following Standards of Conduct are a foundation for the behaviors that are expected from associates, Medical Staff members, Board and Board Committee members and contractors.

# Mission, Vision and Values

Our Mission, Vision, and Values provide a strong foundation and guidance for the work we do in transforming healthcare in the United States. They serve as a framework that expresses our priorities in responding to the care of those most in need.

## MISSION

Rooted in the loving ministry of Jesus as healer, we commit ourselves to serving all persons with special attention to those who are poor and vulnerable. Our Catholic health ministry is dedicated to spiritually centered, holistic care, which sustains and improves the health of individuals and communities. We are advocates for a compassionate and just society through our actions and our words.

## VISION

Answering God's call to bring health, healing and hope to all.

## VALUES

We have a common vision and are called to act upon the following ideas and beliefs:

**Service of the poor** – Generosity of spirit, especially for persons most in need

**Reverence** – Respect and compassion for the dignity and diversity of life

**Integrity** – Inspiring trust through personal leadership

**Wisdom** – Integrating excellence and stewardship

**Creativity** – Courageous innovation

**Dedication** – Affirming the hope and joy of our ministry

## Standards of Conduct

# Relationships with others

We will interact with others in a sincere and authentic manner. We will develop relationships with others based on honesty, fairness and mutual trust. We will act with dignity and mutual respect and will not discriminate against individuals on the basis of race, color, gender/sex, religion, age, national origin, citizenship, disability, genetic information, marital status, veteran status, or any other legally protected status.

### What is expected of me?

- Treat others fairly, honestly and with dignity.
- Treat others respectfully, without discrimination.
- Communicate with others openly, honestly and respectfully.

**Q. I heard a co-worker making racially offensive jokes with other co-workers. It made me really uncomfortable. What should I do?**

**A. Immediately report the incident to your supervisor, the Human Resources Department, [Ascension Compliance](#) or the Values Line.**

## Standards of Conduct

# Compliance

We will operate in accordance with all laws and regulations applicable to Ascension.

### What is expected of me?

Follow all laws and regulations that apply to your work and ask for assistance if you have questions about how they affect you. Examples of laws that apply to Ascension are as follows:

- Maintain privacy and security of protected health information in keeping with HIPAA. Do not access, use, disclose or discuss protected health information with others unless there is a business need to know or required by law.
- Ensure that services billed to federal health care programs meet all necessary coverage and documentation requirements consistent with applicable billing rules and regulations.
- Only enter financial arrangements with physicians that meet the requirements of the Federal Stark Law and Anti-Kickback Statute and consistent with applicable Ascension policies.
- Avoid discussions and collaborations with competitors about pricing, terms and other market information in compliance with antitrust laws.

**Q. My co-worker recently posted a notice on the associate bulletin board asking associates to join her in forming a group to support a candidate for city council. Is this allowed?**

A. No. Using Ascension's resources to participate or encourage participation in political campaign activities is not allowed and could jeopardize our tax-exempt status.

**Q. What should I do if my laptop is stolen on a weekend or after business hours?**

A. Contact your leader, HIPAA Privacy Officer and the Ascension Information Services Service Desk.

## Standards of Conduct

# Associate experience

We strive to cultivate a work environment where associates' uniqueness and the intrinsic worth of every individual is respected; where they are treated with dignity, respect, and compassion to foster a trusting work environment; where they are provided meaningful and holistic resources to live healthfully and practice safely; where all associates are recognized and rewarded for their achievements; where they are provided with the tools necessary to do their jobs well; where everyone has the opportunity to develop their skills and competencies and discover their purpose; where policies and procedures foster fair, consistent, and equitable treatment for all. Through our Mission we continue to seek opportunities to recognize our shared humanity and bring our actions into the service of love, truth, respect, compassion and justice.

### What is expected of me?

- Be supportive of others and work as a team.
- Be committed to ongoing learning, including training or educational opportunities.
- Create a workplace that fosters community and honors and cares for the dignity, safety and well-being of all persons.

**Q. I don't get along with one of my co-workers. We share certain responsibilities, but I feel like I do most of the work while he just passes the time. What should I do?**

**A.** When you have a conflict with a co-worker, the best course of action is to discuss it with the person privately. Explain what you have observed and how it affects the work of your department. If you don't see a change in behavior, notify your leader. You should alert your leader if you think the behavior may violate a law or the Standards of Conduct.

# Business ethical practices and confidentiality

We are committed to ethical business conduct and integrity consistent with our Catholic tradition. Associates must represent the organization accurately and honestly. They must not purposely defraud anyone, including other companies or the government, of money, property, or services. Associates must take all reasonable steps to preserve and protect the organization's assets by making prudent and effective use of its resources, and properly and accurately reporting its financial condition.

Associates have access to a variety of confidential and proprietary records and data, including personally identifiable information, patient information and company trade secrets. Associates are expected to: maintain the confidentiality of all organization information; access, use and disclose confidential and proprietary information only for which they are authorized; keep confidential and proprietary information secure when not using the information; and refrain from discussing confidential and proprietary information with unauthorized personnel or outside sources.

### What is expected of me?

- Adhere to the highest standards of ethical business practices.
- Do not disclose confidential information related to Ascension to any outside unauthorized person or organization, or use such information for your personal benefit.
- Share confidential information about Ascension with associates only when they have a legitimate need to know the information in order to perform their job.
- Maintain confidential information, including financial data and associate-related information, in a confidential and secure manner.
- Prepare all documents accurately and timely, including expense reports, time and attendance records, financial statements, and accounting records.
- Deal with regulatory agencies honestly and accurately.
- Properly use and protect Ascension resources including supplies, equipment, associate time and financial assets.
- Act only within the scope of the authority granted with your job.

**Q. Before coming to work at Ascension, I consulted for a competitor and obtained information that would help us negotiate favorable contracts. Should I share this information with others in the organization?**

**A. No.** Do not disclose confidential information learned through another job. It is unethical and possibly illegal to share confidential information you learn from your association with one employer with another employer should you leave the organization. Further, we will not be able to use this type of information in any business dealings.

# Conflicts of interest

Associates are expected to act in a manner that is in the best interest of the organization. Associates may not use their positions to profit personally or to assist others in profiting in any way at the expense of the organization. In any situation where an associate's outside interests conflict with those of the organization, the associate must disclose the conflict in accordance with organizational policy.

### What is expected of me?

- Follow the Ascension Conflict of Interest policy. Do not engage in any activity, practice or act that conflicts with the interests of Ascension.
- Do not make any decision or discussion affecting Ascension that might represent a conflict of interest when serving as a member of an outside organization or board.
- Do not accept employment or consulting arrangements outside of Ascension, or make personal investments, if they interfere with your job or unduly influence the decisions you are required to make on behalf of Ascension.

**Q. My sister-in-law is a healthcare consultant. Would it be a conflict if I recommended her to work on a project at my organization?**

**A.** No, unless you do something to provide her with an advantage or special consideration or if you receive something of value in return. If you recommend your sister-in-law for the project, you should fully disclose your relationship. You should not participate in the selection decision. Also, you must not share information with your sister-in-law that other prospective vendors or consultants would not have.

# Your voice: Where to find help

You may face circumstances that can leave you wondering which path to take, which choice to make and how to make it. This is particularly true when you are confronted with challenges to your ethical and legal standards.

As a responsible associate, it is your right and duty to find help and report situations that you believe may potentially violate laws, the Standards of Conduct or applicable policies. It is not a question of betraying confidence. It's a question of the continued respect and viability of our organization and professional responsibilities. There are several ways in which you can ask a question or share a concern if you do not know whether a particular action would violate laws, the Standards of Conduct or harm Ascension.

## Your supervisor or manager

This is usually the best place to start in getting answers to your questions. Your supervisor or manager may have the information you need or be able to direct you to the right resource.

## Higher-level manager

If you are not comfortable discussing a situation with your supervisor or manager or do not agree with the answer you receive, consider discussing the issue with a higher-level manager.

## Ascension Compliance

Each Ascension organization has a designated Compliance leader, whose contact information can be found [here](#) (link must be accessed from an Ascension network). Ascension Compliance is responsible for the Compliance Program and can assist in addressing your questions and concerns.

# Values Line

We encourage you to use one of the resources on the previous page to address your questions and concerns. If you are not comfortable contacting any of these associates or if these associates have not fully resolved your concern, you can call the Ascension Values Line at **800-707-2198** or use the Values Line website at **ascensionvaluesline.org**.

The Values Line is available 24 hours a day, seven days a week. Your call to the Values Line is answered by an outside company. Questions may be asked of you to gather additional information. At the close of the call, you will receive a unique identification number and a specific date after which you can check on the status of your concern. You may report your concerns anonymously. The calls are not recorded or traced.

The outside company prepares a confidential report based on the information you provide. The report is forwarded to Ascension Compliance for review, investigation and, when appropriate, corrective action as necessary to address the question or concern.

If you use the website, there are a series of screens that walk you through the process of preparing and submitting a report. After you submit a report, you will be provided a follow-up date, report number and personal identification number that you can use later to check on the status of your report.

**Q. If I report what I think is a violation of the Standards of Conduct, and no violation is found upon investigation, will I get in trouble?**

**A.** There will be no action taken against you for reporting a suspected violation in good faith. You may report concerns anonymously when calling the Values Line.

## Standards of Conduct

# Acknowledgement

### **Please sign and complete the Standards of Conduct form.**

I have received my personal copy of the Standards of Conduct and agree to follow them. I understand that compliance with the Standards of Conduct is a condition of my continued employment or association with Ascension.

I will uphold the highest standard of ethical and legal business practices. I will not tolerate illegal or questionable activity and promise to identify, report and prevent such activity.

I am expected to maintain the privacy and security of all confidential information, including patient protected health information whether in paper or electronic format. I agree to adhere to Ascension policies, which includes maintaining the confidentiality of information in all electronic systems to which I have access.

I will not use, disclose or discuss confidential and protected health information with others unless permitted to do so based on my job responsibilities or as required by law.

**Signature:** \_\_\_\_\_

**Print name:** \_\_\_\_\_

**Date:** \_\_\_\_\_