



Standards of Conduct

The Corporate Integrity Program



When your child needs a hospital, everything matters.SM

Nationwide Children's Hospital, Inc.

Center for Child and Family Advocacy at Nationwide Children's Hospital
DBA The Center for Family Safety and Healing

Children's Anesthesia Associates

Children's Community Practices, LLC

Children's Orthopedic Medical Center, LLC

Children's Physical Medicine and Rehabilitation Physicians, LLC

Children's Psychiatrists, LLC

Children's Radiological Institute

Children's Surgical Associates, Corp.

Medical Staff of Nationwide Children's Hospital

Nationwide Children's Hospital

Nationwide Children's Hospital Foundation

Nationwide Children's Hospital Homecare

Partners For Kids

Pediatric Academic Association, Inc.

Pediatric Pathology Associates of Columbus

The Research Institute at Nationwide Children's Hospital

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Message from Steve Allen, MD

Dear Members of the Nationwide Children's Hospital Community,

Nationwide Children's Hospital, Inc. (Nationwide Children's) is committed to fulfilling its mission in full compliance with all applicable laws, and regulations. Every employee, medical staff member, volunteer, contracted employee, trainee and board member (Nationwide Children's Team) is expected to best represent the organization by conducting themselves in a responsible, ethical and legal manner.

The Nationwide Children's Hospital Standards of Conduct, available in a printed version and on the Nationwide Children's Intranet, outlines standards of ethical conduct. Everyone is required to follow the Standards while serving patients, families, fellow employees, the organization or other organizational stakeholders.

Nationwide Children's believes in and encourages an open communication policy for the Nationwide Children's Team. If you are concerned about questionable practices or noncompliance related to these Standards of Conduct, you have an obligation to report your concern. Page 4 contains the channels of communication for reporting a compliance concern. Nationwide Children's prohibits retaliation or retribution against anyone for reporting problems in good faith through either the regular channels of communication, the Compliance Officer, the Hotline or the secure Website.

Nationwide Children's is committed to the principles set forth in these Standards of Conduct and by our Corporate Integrity program. Thank you for helping keep Nationwide Children's a great organization.

Sincerely,

Steve Allen, MD
Chief Executive Officer

Nationwide Children's Leadership Philosophy

Nationwide Children's embraces the mission of patient care, advocacy, research, education and service driven by community and customer need. This philosophy is characterized through the following core values of Nationwide Children's.

Nationwide Children's Values

As **One Team** we:

Do the right thing

- We always act with integrity and honesty
- We are inclusive and respectful of everyone

Create a safe day every day

- We make safety our personal commitment
- We communicate clearly and completely
- We routinely seek input from others and always support our colleagues

Promote health and well-being

- We balance work and life demands
- We generate optimism and energy in one another
- We advance our health and the health of our community

Are agile and innovative

- We embrace and manage change
- We foster a streamlined and entrepreneurial environment
- We generate and share new knowledge and ideas

Get results

- We're accountable (we do what we say we'll do)
- We're determined (we get the desired result)
- We're committed to constant improvement
- We leverage our diverse strengths

Outcome of this Philosophy

Nationwide Children's believes that this philosophy, carried out through these values will ensure that things are done right and customers, employees, and staff are happy.

Your Responsibility under The Standards of Conduct

Adherence to the Standards of Conduct is a condition of employment and credentialing. Violations of the Standards will result in disciplinary action, up to and including termination of employment or staff privileges, as applicable. Reports of suspected violations by a member of the medical staff will be referred to the Medical Staff Leadership for review and action. Reports of suspected violations by others will be referred to the Compliance Department, Human Resources Department and/or appropriate management for review and action. Please refer to the Medical Staff By-Laws section on Professional Conduct and Competency or the hospital's human resources policies for additional guidance.

The following examples are intended to highlight some behaviors that violate the Standards of Conduct; the list is not exhaustive.

1. Physical, verbal or sexual abuse or harassment (in any form) of patients, coworkers, families, and visitors (including the use of foul language).
2. Inappropriate criticism of care expressed publicly (in a chart, in a letter, in a report, verbally in a public place, or in an email or other electronic communication including social media).
3. Inappropriate criticism of patients or families expressed publicly (in a chart, in a letter, in a report, verbally in a public place, or in an email or other electronic communication including social media).
4. Inadequate, incomplete, insensitive or untimely communication or documentation related to patient care.
5. Rendering patient care while impaired.
6. Billing for services that are not medically necessary or have not been documented in the medical record.
7. Violating a patient's privacy.
8. Behaviors that violate the rules and boundaries surrounding your professional licensure.

Anyone who suspects a violation of the Standards of Conduct, policies and procedures, laws or regulations must report the suspected violation. Failure to report a known violation may result in disciplinary action even if you were not involved.

Please use the communication channels outlined on page 4. You may also report your concern to the Compliance Officer (see page 12) or anonymously to the Hotline or Website (see page 13).

Patient safety concerns that have not been resolved through internal mechanisms may be reported to The Joint Commission at 1-800-994-6610 or www.jointcommission.org.

Corporate Integrity Program Individual Reporting Responsibilities

01/29/2010

Identify potential compliance problems or concerns

Contact your direct supervisor/manager or physician leader

If your issue is not addressed or resolved--

Relay your concerns to the next level of management

OR

Medical Staff Officer

Human Resources

Administrative or Physician Leader

The Corporate Compliance Officer

If assistance is still needed, or if you are uncomfortable taking the above steps--

Call the Hotline at 1-877-267-1935
Or Report through the Website at
<https://nationwidechildrens.alertline.com>

Non-Retaliation Policy

No disciplinary action or other form of retaliation shall be taken against an individual who, in good faith, reports an issue, problem, concern or violation to management, human resources, the Compliance Officer, Hotline, Website, The Joint Commission or other regulatory agency. Reporting does not protect individuals from appropriate disciplinary action regarding their own unacceptable performance or conduct. However, self-disclosure will be viewed favorably and may reduce potential disciplinary actions.

Human Resources

Nationwide Children's is committed to protecting, supporting and developing human resources and promoting fundamental principles of professionalism.

- We will provide a work environment free from harassment and intimidation. Harassment is defined as physical or verbal conduct that is offensive or hostile.
- We will not discriminate on the basis of race, color, creed, national origin, religion, sex, sexual orientation, disability, or age.
- We will strive to build competence, confidence and professionalism in every member of our Team.
- We will encourage everyone to evaluate existing methods of delivering services in order to discover more effective ways of allocating the resources for patient care and the support services.
- We will endeavor to maintain open lines of communication so that the views of each individual may be considered and their opinions given proper respect.
- We will show respect and consideration for one another, regardless of status or position.
- We will provide appropriate supervision in our educational programs that is commensurate with trainees' level of training and experience and assures safe and effective delivery of patient care.

Quality of Care

Nationwide Children's is committed to providing quality care and services to our patients, their families and the communities we serve.

- We will promote a culture of patient safety at every level by striving to continuously enhance patient care. Our quality improvement initiatives are family-centered, based on best available evidence, and reflect the key principles of "Do Not Harm Me," "Heal Me," and "Be Nice to Me-Treat Me with Respect."
- We will anticipate and respond to patient and family needs and, whenever possible, exceed their expectations.
- We will encourage open and honest communication with our patients, families and the healthcare team, recognizing their right to informed consent and the right to refuse treatment in accordance with applicable law.
- We will respect the human dignity of each patient by protecting their confidentiality and sensitively responding to patient questions, concerns and needs in a timely manner.
- We will ensure that admissions, transfers, and discharges are medically appropriate. Admission, transfer and discharge decisions will not be based on the patient's ability or inability to pay.
- We will employ properly licensed and credentialed providers with proper expertise and experience to care for our patients.
- We will not discriminate against any patient for any reason including race, color, creed, national origin, religion, gender, sexual orientation, disability, or ability to pay.
- We will act in ways that merit trust, confidence, and respect of patients and their families, employees, medical staff, volunteers, trainees, board members, and other interested parties.
- We will protect the integrity of clinical decision making, regardless of how Nationwide Children's compensates or shares financial risk with its leaders, managers, clinical staff, and licensed independent practitioners.

Environmental Health & Safety

Nationwide Children's strives to provide patients and their families, employees, medical staff, volunteers, trainees, board members and visitors with a secure and safe environment in which to work, visit, live, and provide services.

- We will take reasonable precautions and follow safety rules and regulations to promote and maintain a safe environment.
- We will provide an environment that is free from violence. Unauthorized weapons of any kind are strictly prohibited in any Nationwide Children's facility.
- We are committed to a drug free, tobacco free, alcohol free and weapon free work place. The manufacture, distribution, possession or consumption of alcohol or drugs, or reporting to work in an impaired condition, is strictly prohibited. Over-the-counter and physician prescribed medications being taken according to direction are acceptable so long as the individual is not impaired.
- We will follow the rules and regulations regarding the disposal of hazardous waste material in accordance with our policy.
- We will promptly report any accidents involving injury to patients and their families, employees, medical staff, volunteers, trainees, board members or visitors through the incident reporting system.

Protection of Privacy

Nationwide Children's is committed to protecting the privacy of its patients' protected health information (PHI).

- We will notify patients and their families of their rights to privacy.
- We will take reasonable steps to safeguard our patients' privacy.
- We will not permit unauthorized disclosure of our patients' protected health information.
- We will employ caution to avoid being heard by others when discussing confidential patient information.
- We will access computerized patient and other confidential information only as necessary to perform job duties.

Protection of Property

Nationwide Children's is committed to protecting its property, and the property entrusted to us, against loss, theft or misuse. Property includes physical assets, funds, proprietary information and intellectual property.

- We will correctly use and care for all property and equipment entrusted to us.
- We will respect and take reasonable steps to safeguard the property of patients and their families, employees, medical staff, volunteers, trainees, board members, donors, and visitors.
- We will maintain, inventory and keep supplies secure.
- We will dispose of surplus or obsolete property and equipment according to established Nationwide Children's procedures.
- We will only permit making authorized copies of computer software or using personal software on computer equipment.
- We will not communicate or transfer any information or documents to any unauthorized persons.

Compliance with Laws & Regulations

Nationwide Children's will carry out its mission and conduct its business in accordance with applicable laws, regulations and professional standards (including accreditation) in order to promote a culture of integrity and high ethical standards.

- We will maintain patient, employee, system and other information in a confidential manner and will not share or access that information in an unauthorized manner. Sensitive information concerning personnel and management will be maintained in confidence and utilized only by authorized individuals.
- We will ensure and support that patient and family rights are respected and exercised during each patient's encounter with Nationwide Children's.
- We will not offer gifts, entertainment, meals or anything else of value to members of the United States Senate or House of Representatives or their staff. We will seek further guidance on gifts to government officials from the Government Relations Office at 355-0701.
- We will ensure that agreements with individuals or organizations that may be a referral source are in writing and approved by appropriate management or legal counsel.
- We will not provide kickbacks, rebates or anything else of value in order to influence referrals of patients or services.
- We will conduct marketing and fundraising practices with truth, accuracy and responsibility to patients and the community.
- We will ensure compliance with the requirements of grants and gifts from government and private sources who donate or provide funds to Nationwide Children's.

Billing & Coding

Nationwide Children's will maintain a commitment to fair and accurate billing that is in accordance with federal and state laws and regulations.

- We will bill only for services that are medically necessary, actually provided and documented in the patient's medical records.
- We will assign billing codes that accurately reflect the services and products that were provided. Upcoding, unbundling or any other means of artificially enhancing reimbursement is unlawful and strictly prohibited.
- We will submit electronic billing data in a format that complies with applicable laws and regulations.
- We will regularly review our records for credit balances and promptly refund any overpayments.
- We will not routinely waive insurance co-payments or deductibles.
- We will store records in a secure location.
- The premature destruction or alteration of any document in response to, or in anticipation of, a request for those documents by any government agency or court is strictly prohibited.
- We will conduct collection/credit procedures according to the Fair Debt Collection Practices Act.
- We will not knowingly submit for payment a claim we know to be false, fraudulent or fictitious. Submitting false or fraudulent claims is in violation of the Federal False Claims Act and may result in financial penalties of \$10,781 to \$21,563 per claim.

Conflicts of Interest

Nationwide Children's employees, medical staff, volunteers, trainees, and board members are expected to refrain from and avoid conflicts or the appearance of conflicts between their private interests and those of Nationwide Children's.

- We will not pursue activities that might conflict, or appear to conflict, with the interests of the organization. A conflict exists whenever an employee, medical staff member, volunteer, trainee, board member or a related party (e.g. family member, friend, or business associate) may receive a benefit from any job-related decision or action taken.
- We will exercise good faith and fair dealing in transactions that involve our responsibilities to the organization.
- We will not misuse our position for personal gain.
- We will only accept or provide gifts in accordance with Nationwide Children's policies.
- The acceptance or provision of business related activities, such as meals and entertainment, must comply with the established Nationwide Children's policies.
- Nationwide Children's does not object to employees holding other jobs as long as they can effectively meet the performance and attendance standards for their job at Nationwide Children's and no conflict is caused by the arrangement.
- We will follow the Nationwide Children's Conflict of Interest Policy and disclose potential conflicts of interest or commitment to management or administration in accordance with that policy.
- We will not allow any conflict that could impact the integrity of research.
- We will devote our working time to the performance of Nationwide Children's duties.

Compliance Officer

Nationwide Children's has appointed a Corporate Compliance Officer (CCO) who is responsible for the oversight of the Integrity Program. Some of the CCO's responsibilities include:

- Participation in establishing and maintaining the Standards of Conduct;
- Overseeing the operation of the Hotline and Website;
- Ensuring that auditing and monitoring mechanisms are established;
- Receiving, investigating, and resolving problems, concerns, questions and issues raised related to the Integrity Program, including potential violations of the Standards of Conduct, policies and procedures, laws and regulations;
- Communicating directly with the Board of Directors regarding any criminal conduct or potential criminal conduct.

You may contact the Corporate Compliance Officer at 355-0400 (or 50400 internally). Please refer to the Corporate Compliance web page on the hospital intranet for more information on these Standards or for guidance on specific compliance issues.

Hotline & Website Reporting Mechanisms

Nationwide Children's urges you to first report concerns to a supervisor, manager, physician leader, administrator, or Human Resources. However, Nationwide Children's recognizes that there may be times when concerns cannot be properly addressed through the normal communication channels. When such situations develop, you are encouraged to contact the Compliance Officer (see page one) or to call the Hotline at 1-877-267-1935 or file a report through our secure Website referenced below.

All calls to the Compliance Officer or reports made through the Hotline or Website will be taken seriously and will be investigated promptly and professionally.

Hotline & Website reporters may remain anonymous with the understanding that there may be situations when the Compliance Officer may not be able to research or resolve a situation unless the identity of the reporter is known. Hotline calls and Web reports will remain confidential to the extent possible.

No action of retaliation will be taken against anyone who, in good faith, reports a concern to management, Human Resources, the Compliance Officer, the Hotline or the Website. However, reports to the Hotline or Website do not protect reporters from appropriate disciplinary action regarding their own unacceptable performance or conduct.

The Compliance Officer will evaluate and respond to allegations of wrongdoing, concerns and/or inquiries made to the Hotline or Website.

Hotline:

1-877-267-1935

Website:

<https://nationwidechildrens.alertline.com>

Certification Related to Nationwide Children’s Corporate Integrity Program

I have received a copy of the Nationwide Children’s Standards of Conduct for the Nationwide Children’s Corporate Integrity Program.

I understand how the Standards of Conduct apply to me and agree to comply with each provision.

The reporting procedures have been reviewed with me. If I have concerns about unethical behavior, a suspected violation of the Standards of Conduct, or any other laws or regulations, I will report my concerns through the usual communication channels. There is also a hotline I can call if I wish to remain anonymous.

I understand that Nationwide Children’s prohibits retaliation or retribution against anyone for good-faith reporting of concerns.

This Certification is not intended to set forth any expressed or implied contractual obligations and Nationwide Children’s retains the right to modify the Standards of Conduct at any time. I understand all updates and revisions to the Standards of Conduct apply to me.

Name: (Please Print)

Signature:

Date: _____

Note: This certification must be signed by you. The signed copy of this form will be maintained in your file.

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NationwideChildrens.org



NATIONWIDE
CHILDREN'S

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