



Standards of Conduct

The Corporate Integrity Program



**NATIONWIDE
CHILDREN'S®**

When your child needs a hospital, everything matters.



Nationwide Children's Hospital, Inc.

The following affiliates are included under the umbrella of 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, Inc.

Children's Community Practices, LLC

Children's Newborn Medicine, LLC

Children's Physical Medicine and Rehabilitation Physicians, LLC

Children's Psychiatrists, LLC

Children's Radiological Institute, Inc.

Children's Surgical Associates Corp.

Medical Staff of Nationwide Children's Hospital

Medical Staff of Nationwide Children's Hospital Toledo

Nationwide Children's Hospital

Nationwide Children's Hospital Foundation

Nationwide Children's Hospital Toledo, LLC

Northwest Children's Community Practices II, LLC

Northwest Pediatric Specialists, LLC

Children's Hospital and Physicians' Healthcare Network
DBA Partners For Kids

Pediatric Academic Association, Inc.

Pediatric Pathology Associates of Columbus, Inc.

Research Institute at Nationwide Children's Hospital
DBA The Abigail Wexner Research Institute

The Kids Mental Health Foundation





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Message from Tim Robinson

Team,

Nationwide Children's Hospital often talks about our One Team values. The first value, "We Do the Right Thing," is the one that governs all the rest.

The "right thing" may have different meanings depending on your role at Nationwide Children's, but it always means that we act with respect, integrity, and honesty, and in a legal, responsible, and ethical manner. That is how we best serve children, their families, our colleagues and our community.

That Nationwide Children's Standards of Conduct is our guide. **Everyone who represents the hospital – every employee, medical staff member, contractor, volunteer, trainee, and board member – is required to follow these standards. They apply to all of us.**

Beyond that, each of us has a duty to report behaviors or actions that are questionable or appear to break from these standards. Many of the standards are designed to keep our colleagues and/or the families we serve safe. When you report concerns, you are helping Nationwide Children's best fulfill our mission.

This is very important, and we work to foster a safe culture for reporting:

- We do not allow retaliation against anyone who reports a concern in good faith
- We promptly evaluate and investigate reports
- We offer confidential reporting methods if you feel you cannot inform supervisors or Human Resources directly:
 - You can call the Compliance Officer at **(614) 355-0400**
 - You can call an anonymous hotline at **1 (877) 267-1935**
 - You can submit an anonymous report through **<https://NCH.EthicsPoint.com>**

Thank you all for your commitment to doing the right thing and helping Nationwide Children's abide by these Standards of Conduct.

Best,

Timothy C. Robinson
CEO, Nationwide Children's Hospital

Nationwide Children's Philosophy and Values

Nationwide Children's Hospital is committed to best outcomes and health equity for all children, ensuring every child has access to the best care regardless of their ability to pay.

As **One Team** where Everyone Matters we:

Do the right thing

- We are committed to health equity for all children
- We always act with integrity, kindness, empathy and honesty
- We are inclusive and respectful, embracing the uniqueness and differences of each individual

Prioritize Quality and Safety

- We put patients and families in the center of every decision
- We create a safe day every day
- 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 lead positive change
- We fuel a streamlined environment and an entrepreneurial spirit
- We generate and share new knowledge and ideas

Get results

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

Outcome of this Philosophy

Consistently practicing these values has helped transform Nationwide Children's into an international destination pediatric health care and research center. They set us apart and make us better, empowering our ability to provide the highest quality care for patients and whole child wellness, advocacy for children and families, research discoveries, and education of patients, families, team members and the community.

Your Responsibility Under the Standards of Conduct

Following the Standards of Conduct is a condition of employment, credentialing, training and/or volunteering. It is everyone's responsibility to perform their work in a manner consistent with the Standards of Conduct. Violations of the Standards will result in disciplinary action, up to and including termination of employment or staff/education/volunteer 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 (see Medical Staff By-Laws section on Professional Conduct and Competency). Reports of suspected violations by others will be referred to the Office of Compliance & Integrity and/or appropriate management for review and action.

The following examples highlight *some* behaviors that violate the Standards of Conduct.

1. Engaging in physical, verbal (including use of foul language) or sexual abuse or harassment (in any form) of patients, coworkers, families, visitors, volunteers, or trainees.
2. Engaging in or promoting racist or discriminatory behavior toward patients, coworkers, families, or visitors, including on social media.
3. Bullying or intimidation of faculty, colleagues, staff, or trainees.
4. Criticizing or commenting about patients or patient care, families, faculty, colleagues, staff, or NCH verbally in a public place or expressed in a chart, letter, email, or other electronic communication, including social media.
5. Inappropriate use of social media that in any way violates any Nationwide Children's policy, including the social media policy or the Standards of Conduct.
6. Patient care communication or documentation that is inadequate, incorrect, insensitive, or untimely.
7. Rendering patient care while impaired, whether from drugs/alcohol, illness, lack of sleep or excessive stress.
8. Billing for services that are not medically necessary or have not been documented in the medical record.
9. Violating a patient's, colleague's, or trainee's privacy.
10. Engaging in behaviors that violate the rules and boundaries surrounding your professional licensure.
11. Engaging in behavior that is not in line with the Zero Hero principle, including a culture that fosters a questioning attitude and encourages the reporting of concerns.

Leader Responsibility

Leaders (anyone who leads people, projects, or programs) play a vital role in creating the environment and culture essential to addressing concerns raised by staff. They set an example and are role models of both ethical behavior and willingness to hear concerns. Leaders are also responsible for ensuring that staff are educated on applicable policies and regulations and are aware of how to report concerns.

Reporting and Investigations

Compliance is everyone's responsibility. Anyone who knows of or suspects a violation of the Standards of Conduct or any laws, regulations, or Nationwide Children's policies must report the concern. Nationwide Children's will promptly investigate any alleged noncompliance. Failure to report a suspected violation may result in disciplinary action even if you were not involved.

Please use any of the communication channels outlined on page 9. You may also report your concern to the Compliance Officer at any time.

Non-Retaliation Policy

Nationwide Children's will not take any action against someone for reporting a compliance concern in good faith. Nationwide Children's prohibits intimidation and other forms of retaliation against staff for making a compliance report in good faith. Reporting does not protect staff from appropriate disciplinary action regarding their own noncompliant or unacceptable conduct. However, your good faith efforts and self-disclosure will be viewed favorably and may reduce potential disciplinary actions.



STANDARDS OF CONDUCT

Human Resources

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

- We will treat everyone with respect, dignity, and consideration for one another, regardless of status or position within the organization.
- We will provide a work environment free from harassment, bullying, racism, and intimidation. Harassment is defined as physical or verbal conduct that is offensive or hostile.
- We will not discriminate or tolerate discrimination based on race, color, creed, national origin, religion, sex, sexual orientation, gender identity, disability, veteran status, or age.
- We will support and encourage an environment that respects the value and dignity of colleagues, patients, families and the community.
- We will strive to build competence, confidence, and professionalism in every member of our Team.
- We will recognize and respect the contributions of each member of the 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 person may be considered and their opinions given proper respect.
- 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 our SCOPE framework, which are: Safety, Clinical Outcomes, Population health, Equity and Experience.
- We will anticipate and respond to patient and family needs. Whenever possible we will exceed their expectations.
- We will place the safety and care of the patient and family above our own business, administrative, personal and financial interests.
- We will encourage open and honest communication with our patients, families, and the healthcare team. We recognize the right of patients and families 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 privacy and confidentiality. We will sensitively respond 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 assure that patient care providers are properly licensed and credentialed with proper expertise and experience to care for our patients.
- We will discuss errors and be open to corrective measures.
- 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 treat others with sensitivity to cultural, religious and lifestyle differences.
- 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.

Health and 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 precautions and follow safety rules and regulations to promote and maintain a safe environment.
- We strive to provide an environment that is free from violence. Unauthorized weapons of any kind are strictly prohibited on any Nationwide Children's owned/leased property.
- We are committed to a drug free, tobacco free, vape free, and alcohol free workplace. Manufacturing, distributing, possessing, or consuming alcohol or drugs, or reporting to work in an impaired condition, is strictly prohibited. Over the counter and provider prescribed medications being taken according to direction are acceptable so long as the individual is not impaired.
- We will follow the rules and regulations for the proper 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 SafeDay.

Protection of Privacy

Nationwide Children's is committed to protecting confidential and other sensitive information, including patients' protected health information (PHI).

- We will maintain patient, employee, trainee, business, research and other information confidentially.
- We will not access or share confidential information in an unauthorized manner. Sensitive information concerning personnel and management will be kept in confidence and used only by authorized individuals. We will do this in accordance with the Confidentiality and Technology Use Agreement and all other applicable policies.
- We will notify patients and their families of their rights to privacy.
- We will not disclose our patients' protected health information in an unauthorized manner.
- We will be careful to avoid being heard by others when discussing patient information.
- We will access patient and other confidential information only as needed to perform job duties.

Protection of Assets

Nationwide Children's is committed to protecting its assets, and the assets entrusted to us, against loss, theft, or misuse. Assets include physical property, 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 policies and procedures.
- We will use Nationwide Children's computer software in compliance with license agreements and for Nationwide Children's use only.
- We will not communicate or transfer any information or documents to any unauthorized persons.
- We will work with a high level of awareness and transparency when we share data and information with foreign entities, including foreign governments, foreign companies, and foreign collaborators.

Compliance with Laws and Regulations

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

- We will make sure that patient and family rights are respected and followed during each patient's encounter with Nationwide Children's.
- We will adhere to all applicable state, federal and local lobbying laws and/or regulations.
- We will ensure that agreements with individuals or organizations that may be a referral source are in writing and in compliance with applicable laws and Nationwide Children's policies.
- 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 comply with the requirements of grants, donations, and other gifts received from government and private sources for the benefit of Nationwide Children's.
- We will abide by all applicable anti-corruption laws and regulations, including the Foreign Corrupt Practices Act. We prohibit the promising, offering or giving of anything of value on behalf of Nationwide Children's to a Foreign Official, in order to obtain or retain business.
- We will not conduct our business with parties who are excluded from state or federal healthcare programs, or who otherwise are prohibited based on background check screenings.
- We will require all drugs and other controlled substances used in treatment to be maintained, stored, dispensed, and transported in compliance with applicable laws and regulations.
- We will comply with all applicable anti-human trafficking laws and regulations, including the Federal Acquisition Regulation for Combatting Trafficking in Persons.

Billing and Coding

Nationwide Children's will maintain a commitment to fair and accurate billing that is in accordance with federal and state laws and regulations, as well as our internal policies. This obligation applies to both government and commercial payors. Failure to do so can put Nationwide Children's at risk for penalties and sanctions.

- We will bill only for services that are medically necessary, rendered to the patient 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 in excess of \$27,000 per claim.

Conflicts of Interest

Nationwide Children's employees, medical staff, researchers, trainees, and board members are expected to fulfill their NCH obligations in an impartial and unbiased manner, and 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, researcher, 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 use our Nationwide Children's role for personal gain.
- We will only accept or provide gifts, meals, and entertainment, in accordance with Nationwide Children's policies.
- We will be sure interactions with vendors do not have the real or perceived potential of improperly influencing clinical judgement, patient care, the conduct of research, or purchasing decisions.
- We will be sure our outside activities, including other job commitments, do not compete with or conflict with our Nationwide Children's job responsibilities. We will be sure the outside activities do not interfere with our ability to meet the performance and attendance standards for our job at Nationwide Children's.
- We will disclose, for review and management, outside activities and financial relationships that may create conflicts of interest or commitment in order to safeguard the integrity and objectivity of our research, education, clinical judgment and business decisions.
- We will devote 100% of our compensated work time to the performance of Nationwide Children's duties. We will not use Nationwide Children's resources, work products, equipment, information systems or intellectual property for activity unrelated to Nationwide Children's, or for personal benefit.
- We will not participate in any malign foreign talent recruitment programs.

Research

Nationwide Children's is committed to following the highest professional and ethical standards for conducting all forms of research, whether the research involves humans or animals or neither.

- We will conduct our research with honesty and integrity, in compliance with applicable federal, state, and local rules/regulations and the guidelines for responsible conduct of research.
- We are committed to protecting the rights of research participants who are involved in our research.
- We will use appropriate monitoring, including Nationwide Children's committees, as well as external committees as needed, to ensure the safety and protection of research participants.
- We are committed to ensuring the privacy of research participants, in accordance with applicable regulations and Nationwide Children's policy.
- We will conduct rigorous and transparent analyses of data, in accordance with sound scientific processes.
- We will report, publish, and present our data in a transparent and ethical manner, and give appropriate credit to contributors in accordance with Nationwide Children's policy and the International Committee of Medical Journal Editors.
- We will conduct our research objectively and with integrity, without financial, personal or ethical biases.
- We are committed to ensuring the humane care and maintenance of animals utilized for research and teaching, in accordance with the Animal Welfare Act and Public Health Services Policy.

COMPLIANCE PROGRAM

Compliance Officer

Nationwide Children's has appointed a Chief Compliance Officer (CCO). The CCO is responsible for the oversight of the Corporate Integrity Program. Some of the CCO's responsibilities includes, but is not limited to:

- Continuously monitors the effectiveness of the Corporate Integrity Program and related compliance activities;
- Establishes and maintains the Standards of Conduct;
- Oversees the communication channels for reporting compliance concerns, including the anonymous Hotline and Website;
- Provides or facilitates education and training on laws and rules/regulations affecting Nationwide Children's;
- Ensures Nationwide Children's implements appropriate auditing and monitoring mechanisms;
- Independently conducts, oversees or directs compliance investigations involving potential violations of the Standards of Conduct, rules or regulations, or policies;
- Follows up on compliance findings, ensuring that appropriate corrective action or resolution has occurred;
- Communicates to senior leaders and the Board of Directors on the Corporate Integrity Program activities.

You may contact the Chief Compliance Officer at (614) 355-0400 (or 5-0400 internally). Please refer to the Office of Compliance and Integrity web page on the hospital intranet for more information on these Standards or for guidance on specific compliance issues.

Open Lines of Communication for Reporting Concerns

It is everyone's right and responsibility to report any activity that may violate the Standards of Conduct or any laws, regulations, or Nationwide Children's policies. There are several options for reporting concerns.

While we encourage employees to report the concern to their manager/supervisor, this is not required. Any of the reporting options below can be used at any time.

- **Consult with your team leader.** They are most familiar with the laws, regulations and policies that relate to departmental activities.
- **Speak with your department or division head or other Administration/Leadership.** If you are not comfortable contacting your team leader, or if you do not receive an adequate response, talk to the department manager, director, physician leader or administrator. You may also choose to speak to someone from Human Resources or Administration.
- **Contact the Office of Compliance & Integrity.** You may contact the Office of Compliance & Integrity at (614) 355-0400 or via email at ComplianceIntegrity@NationwideChildrens.org. For research related concerns, contact the Office of Research Compliance & Integrity at (614) 722-2599 or email ResearchComplianceIntegrity@NationwideChildrens.org.
- **Call the Compliance Hotline or Report Online.** The Compliance Hotline is available 24/7 to anonymously report concerns. Call the Compliance Hotline at (877) 267-1935 or submit your concern on-line at www.NCH.EthicsPoint.com. All concerns will be investigated by the Nationwide Children's Office of Compliance & Integrity and/or referred to the appropriate department for follow up.

We are committed to investigating all reports promptly, while protecting confidentiality and your anonymity as much as possible. After submitting a report through the Compliance Hotline or Website, you will be asked to set a unique password and be given a special case number related to your report. You will also be given information about when and how to receive updates on the status of the matter reported. To the extent that it is possible and appropriate, periodic updates will be provided to you. Once an investigation is completed, action to address the issue will be taken as soon as practicable. Nationwide Children's has a non-retaliation policy, which is described in more detail on Page 4.

Quality of Care Concerns

In addition to the reporting options above, any individual who provides care, treatment and services is free to raise concerns to The Joint Commission and/or Ohio Department of Health and Human Services when Nationwide Children's has not adequately prevented or corrected problems that can have or have had a serious adverse impact on patients, without fear of retaliation. You are encouraged to report and escalate as needed any concerns about safety or quality of care provided by Nationwide Children's. The Ohio Department of Health's direct phone number is **(614) 466-3543**. The Joint Commission's direct phone number is **(800) 994-6610**.

Responding to Governmental Investigations and Inquiries

We cooperate with all lawful investigations and inquiries from government agencies. We must never conceal, destroy, alter, delay, or falsify any documents or information when responding to investigations or inquiries. Should you be contacted by a governmental agency or representative, please contact your team leader, the Office of Compliance and Integrity and/or the Legal Services department so you may receive guidance on how to respond properly. Throughout all investigative processes, Nationwide Children's preserves and protects the legal rights of the organization, team members, and patients.

Helpful Numbers to Know

Compliance Hotline

(877) 267-1935

Office of Compliance & Integrity

(614) 355-0400

Privacy Office (HIPAA)

(614) 355-0711

Employee Relations

(614) 355-4111

The Joint Commission

(800) 994-6610

Ohio Department of Health

(614) 466-3543

Ohio Department of Medicaid - Reporting Medical Provider Fraud

(614) 466-0722



