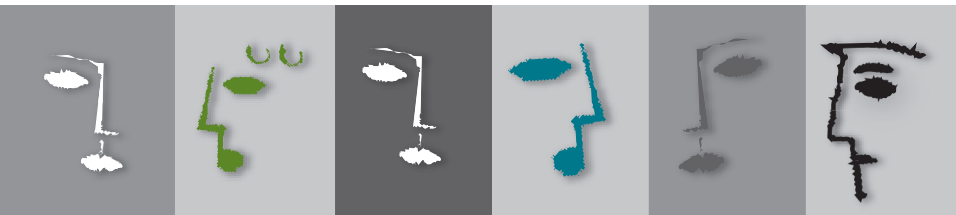


Trinity Health
ORGANIZATIONAL
INTEGRITY PROGRAM

STANDARDS OF CONDUCT • SUPPORTING RIGHT RELATIONSHIPS



*But as for me,
I will walk in my integrity.*

PSALM 26:11

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Mission

We serve together in Trinity Health, in the spirit of the Gospel, to heal body, mind and spirit, to improve the health of our communities and to steward the resources entrusted to us.

Core Values

- Respect
- Social Justice
- Compassion
- Care of the Poor and Underserved
- Excellence

Preferred Culture Characteristics

- Mission-Centered
- Customer-Focused
- Interdependent
- Open Communications
- Socially Responsible

A MESSAGE

From Our Leadership

Trinity Health was established on a foundation of faith-based principles: Respect, Social Justice, Compassion, Care of the Poor and Underserved, and Excellence. These principles and the Mission serve as a compass to guide our ongoing health care ministry.

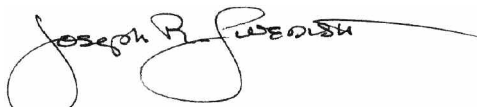
We understand that working in the health care industry is extremely challenging, and sometimes the right course of action can be unclear. The Standards of Conduct are intended to help you respond to common questions and issues you may encounter in your daily work. The Standards are designed to help support “Right Relationships” – relationships with patients and others in our care, relationships with our co-workers and business partners, relationships with the government and others who pay for the health care services we provide, and relationships with our organization and communities.

The Standards describe the behaviors and conduct expected of all Trinity Health associates, volunteers, medical staff and board members. To further apply the Standards to common situations encountered in the workplace, we have included actual questions posed by associates, physicians and others, along with answers.

Please review and become familiar with the Standards of Conduct, particularly those areas that apply to your everyday work activities. When faced with a difficult decision or uncertainty, you should ask questions and seek advice from your supervisor or other appropriate resource. Most important, you’re responsible for speaking up about behaviors or actions that may be inconsistent with the Standards of Conduct. If you have a question or concern that is not specifically addressed by the Standards, please consult one of the many resources listed herein for assistance.

Our health care ministry began more than 150 years ago through the work of our founding religious congregations – the Sisters of Mercy of the Americas, Regional Community of Detroit and the Congregation of the Sisters of the Holy Cross. Our sponsor today, Catholic Health Ministries, calls us to continue the ministry based on our Mission and Core Values. Acting with integrity and making decisions based on the highest standards of ethical behavior are critical to maintaining the long-established and well-deserved reputation we’ve achieved in our communities and within the health care industry.

Thank you for joining us in our shared commitment to be leaders in the delivery of high-quality, safe and effective health care services in our communities, and in transforming the delivery of health care in the United States.



Joseph R. Swedish
President and CEO
Trinity Health

WHY THE STANDARDS OF CONDUCT ARE IMPORTANT

Trinity Health and each of us individually are held accountable for our behaviors and actions. In addition to supporting our Mission and Values, the Standards of Conduct also assist in ensuring that our actions and behaviors are consistent with the numerous legal, ethical and professional obligations that apply to our health system ministry. Actions and behaviors that are inconsistent with the Standards of Conduct can significantly harm relationships with patients, communities, business partners and others we rely upon to assist us in the delivery of health care services.

Individuals will be held accountable for actions and behaviors inconsistent with the Standards of Conduct. Violations could result in disciplinary action, up to and including termination of employment, suspension of medical staff privileges, or termination of business relationships, as applicable, in accordance with Trinity Health's policies.

Our Responsibilities

The Standards of Conduct apply to all associates, contract workers, volunteers, medical staff members, and board members of Trinity Health.

You have a responsibility to:

- Review and follow the Standards of Conduct, paying particular attention to those areas that apply to your every day work activities
- Ask questions when you're uncertain what to do. See page 15 "Where to Find Help" for a listing of resources available to answer questions
- Speak up when you're concerned about behavior that is inconsistent with the Standards of Conduct. See page 15 for a list of resources that can also be used to address your concerns

Responsibilities of Leaders

Leaders in Trinity Health, including managers, supervisors, medical staff leaders, program directors, senior executives, and board members, are held to a higher standard of responsibility. As a leader, you serve a key role in receiving and responding to

questions and concerns raised by associates and others you lead. How you respond to questions and concerns posed to you is key to others having the trust and confidence to bring important matters to your attention.

As a Trinity Health leader, you have a responsibility to:

- Serve as a role model for our Mission 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 inconsistent with our Mission and Core Values, and the Standards of Conduct
- Encourage others to raise issues and concerns so they can appropriately be addressed
- Respond timely and appropriately to issues and concerns when they are brought to your attention
- Support and reinforce our Values through the use of the **Mission Discernment Process** and **Trinity Health Values-Based Decision Making Process**
- Support and promote Trinity Health's policy of non-retaliation against anyone who raises issues and concerns in good faith
- Learn and follow applicable laws and regulations that affect business activities with physicians or other organizations who refer patients to Trinity Health facilities. See page 10 for further information
- Ask for assistance when you're unsure how to respond to an issue or concern. See page 15, "Where to Find Help," for a list of resources

Trinity Health and our founding health systems have served the health care needs of communities for nearly 150 years. Your actions as a leader are critical to upholding the long-established reputation of Trinity Health.

Mission Discernment Process:

A reflective process intended to ensure the Mission and Core Values are included in all major decisions.



FAQ

FREQUENTLY ASKED QUESTIONS

Q: I have an associate who was disciplined for violating one of our policies. The associate was reported by one of his co-workers and he is now treating that co-worker very badly. What should I do?

A: Reporting a policy violation in good faith is an expectation of all our associates. Retaliating against the person who reports such issues is strictly prohibited. This incident clearly needs to be addressed according to existing human resources procedures in your organization.

Q: A manager I work with is notorious for not returning messages in a timely manner. It has hindered our ability to get the job done. What should I do?

A: Timely response is an expectation of leaders in our organization. Discuss the issue with the manager and let him or her know what you observe and how it is impacting your work together. You may be able to offer some tips for time management that have been successful for you. If the behavior continues, or you have approached the manager in the past with no behavior change, contact a higher-level manager.

Q: One of my associates has reported an issue to me, but he doesn't want to tell me who is involved because he doesn't want the person to get in trouble. What should I do?

A: Promoting a culture of trust is critical to our organization. Thank the associate for bringing the issue to your attention. Let the associate know that you understand and appreciate the concern for his or her co-worker; but that it is important to follow up with the associate involved to address the issue and to prevent it from happening in the future.

Trinity Health Values-Based Decision Making Process:

A process intended for use in day-to-day operations when an individual, team or department is met with an issue or situation where:

- There seems to be no single “best” response
- There is a recognized “difference of opinion”
- People don't feel good about the circumstances or the possible resolution

Consult your organization's Mission/Ethics Office if you have questions or need further guidance.

The Mission Discernment Process is to be used whenever Trinity Health or its Ministry Organizations are confronted with a significant decision that:

- Might alter or appear to affect the Catholic identity of an entity
- Might positively or negatively impact the Mission of the organization
- Would significantly affect the status of groups of associates
- Would affect local communities, vulnerable populations or the environment

The Mission Discernment Process should be used for:

- All mergers, acquisitions or major partnerships
- Selected major capital requests
- Addition or deletion of a major service line

Q: I have an associate who has violated one of our Standards of Conduct. He is a really great associate and I'm sure it was all just a misunderstanding. He is very upset and I don't really want to discipline him. What should I do?

A: Although it is sometimes very difficult, it is important to hold associates responsible for behavior that is not consistent with the Standards of Conduct. Re-educating the associate and utilizing existing human resources procedures assures consistent accountability standards for all associates.

Q: As a part of my job, I work with physicians on several matters and the issue of patient referrals comes up from time to time. I know there are laws related to this area, but I don't understand them all. What should I do?

A: There are several resources to help you understand the laws impacting physician relationships and the Trinity Health policies that promote compliance. Contact your Local Integrity Officer or the Legal Department for further guidance.

THE STANDARDS OF CONDUCT: SUPPORTING RIGHT RELATIONSHIPS

Virtually everything we do in Trinity Health is dependent on maintaining right relationships – relationships with our patients and the communities we serve, relationships with co-workers and others who serve with us, and relationships with vendors, business partners, payers and others involved in our delivery of health care services. Right relationships are essential to fulfilling our Mission and achieving our system's Vision.

Trinity Health is committed to ethical conduct that supports right relationships. The Standards of Conduct further describe this commitment using common examples often encountered in the workplace.

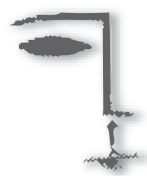
My Relationships With Patients, Their Families and Others We Serve

Trinity Health exists to deliver excellent, high-quality health care services in the communities we serve. Patients, residents and others who entrust their care to us, as well as their families and representatives, are first and foremost our number one priority.

What is Expected of Me?

Whether you are directly involved in the delivery of care to patients, residents or others, or in a role that indirectly supports such services, you are expected to:

- Deliver services with compassion, dignity and respect for everyone in your care, including their family members and other representatives
- Maintain a positive, courteous and customer-service oriented attitude and approach to those you serve. Speak kindly and patiently to patients, their families and others
- Act in the best interests of patients and others in your care
- Respond to requests for information, input or assistance from patients, family members and other representatives in a timely and supportive manner
- Deliver services in accordance with all professional standards that apply to your position
- Follow your organization's policies and procedures that promote a safe patient care environment
- Involve patients, their family members and representatives in care decision-making, including respecting patient and family preferences, when appropriate
- Maintain complete, timely and accurate medical records
- Protect the privacy and confidentiality of all medical and other information of those in your care
- Assist patients in the management of their pain through appropriate and timely assessments and pain management care



Ethics

Ethical and Religious Directives for Catholic Health Care Services:

Authored by the United States Conference of Catholic Bishops, these directives provide ethical standards and authoritative guidance for the delivery of health care services in institutional settings sponsored by the Catholic Church. Consult your organization's mission leader if you have questions or need further assistance.

- Clearly explain the outcome of any treatment or procedure to patients, family members and representatives as appropriate, especially when outcomes differ significantly from expected results. Refer to Trinity Health's protocol for **Responding Justly to Adverse Outcomes**
- Address ethical conflicts that may arise in patient care, including end-of-life issues. Follow the Ethical and Religious Directives for Catholic Health Care Services and utilize Trinity Health's ethics committees or similar decision-making structure.

FAQ

FREQUENTLY ASKED QUESTIONS

Q: If I see that a patient is not being treated with proper respect and courtesy by another care provider, what should I do?

A: First, ensure that the patient is not in harm's way. Then, talk with your supervisor. If your supervisor does not provide a satisfactory response, contact your customer service representative, quality or risk manager, or use one of the resources listed on page 15.

Q: I recently had a patient tell me that he does not want to receive any more treatment and just wants to be made comfortable and allowed to die. The patient does not think the physician is listening to him. What do I say to the patient?

A: Part of patient-centered care is listening to what the patient wants – even if the patient's decision conflicts with your personal values. You should inform the patient's care team of the patient's request and work with the patient's family to meet his needs and wishes. It is important that the patient be presented with appropriate options to ensure the decision is an informed one.

Q: I work in a hospital and have access to the patient registration system. Recently a friend of mine was seen in the emergency room and admitted to the hospital. Can I log into the system and see how she is doing, or at least locate her room number?

A: Since you are not involved in your friend's care, you should not access her medical information or location. You may only access this type of information if you need it to do your job.

Responding Justly to Adverse Outcomes: Disclosing medical errors respects patient autonomy, is consistent with Trinity Health's values, and is desired by patients. "Disclosure" means honestly telling patients or their families about an unexpected harm that occurred as a result of their treatment or care. The process includes honest and direct communication about the unanticipated outcome, a prompt and ongoing supply of information, and a sincere apology. Consult with your mission leader or risk manager if you have not received orientation regarding this protocol.

Health Insurance Portability and Accountability Act (HIPAA): HIPAA is a federal law that requires health care providers and other "covered entities" to protect the privacy and security of patient health information, and provides patients certain specific rights related to their health information. You should be familiar with your organization's policies and procedures to protect the privacy and security of health information. Please contact your local privacy official if you have questions or need further guidance related to HIPAA.

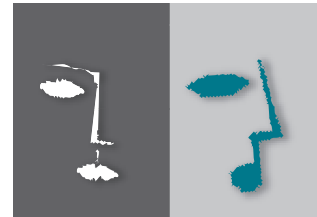
My Relationships With My Co-Workers and Others Who Serve With Me

The delivery of high-quality, effective patient care requires teamwork among all individuals involved. Data shows that work environment has a direct effect on the quality and safety of care delivered. Trust and respect are important factors toward ensuring that all team members utilize their talents, perspectives and ideas to the best of their abilities. At Trinity Health, everyone is expected to treat others as they would like to be treated.

What Is Expected of Me?

Whether an associate, contract worker, volunteer, medical staff member, vendor or other business partner of Trinity Health, you are expected to:

- Treat others with honesty, dignity, fairness and respect
- Maintain a positive, courteous and customer-service oriented attitude and approach. Speak kindly and patiently to your co-workers and others who serve with you
- Commit to working with others in a supportive, team environment
- Support co-workers in providing excellent care and services by responding to requests for information, input or assistance in a timely manner
- Communicate with others in a clear, open and honest manner
- Attempt to address any differences you have with co-workers directly with the individuals involved
- Respect the diversity of others, including racial, ethnic, gender, religious and other differences
- Abstain from physical contact with co-workers and others who serve with you. Report harassment, intimidation or violence of any kind that you witness in the workplace. See page 15, "Where to Find Help," for a list of resources
- Respect the individual privacy of co-workers and others



FAQ

FREQUENTLY ASKED QUESTIONS

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

A: This matter should be handled according to your organization's existing human resources procedures. First, contact your supervisor to report the matter. If you are not satisfied with the response, or if you feel you cannot approach your supervisor on the issue, contact a higher-level manager; the Local Integrity Officer; submit a PEERS report or call the Trinity Health Integrity Line.

Q: I have noticed that a male associate has been very "friendly" with his female co-workers in the department. There's a lot of touching, even when other people are in the room. I don't think this is appropriate. What should I do?

A: This is clearly a matter that must be addressed according to existing procedures such as Trinity Health's sexual harassment policy. First, notify your supervisor of the issue. If you are not satisfied with your supervisor's response, or if you aren't comfortable approaching your supervisor on such an issue, you should discuss your concern with the appropriate person in your human resources department. If you feel the need for additional assistance, contact your Local Integrity Officer or call the Integrity Line. See page 15 for further information.

Q: I have a real problem with one of my co-workers. She and I share an assignment in my department, but I feel like I carry most of the load and she just slacks off. I really don't want to work with her anymore. What should I do?

A: Whenever you experience a conflict with a co-worker, it is best to discuss it privately with the person. Explain what you have observed and how it is impacting the work of your team. If you don't see a change in behavior or you have approached your co-worker about this issue before, but the behavior continues, notify your supervisor.

Q: I work in the human resources department. Lately I have been finding confidential associate information left behind at the copy machine we share with other departments down the hall. What should I do?

A: Respecting the privacy of associates is important. Take the documents you found to your supervisor. The supervisor will determine the appropriate way to handle the information and follow up with staff as necessary.

Q: Yesterday I saw a manager yell and scream at an associate in the presence of a patient and other associates. I was very bothered by the manager's behavior and felt terrible for the associate. Is there anything I can do?

A: Trinity Health is committed to promoting a **Respectful Work Environment**. Behavior that is rude, embarrassing, threatening, berating, belittling or intimidating, including use of profane or abusive language, is not appropriate under any circumstances. There are several options to report such behavior, including your supervisor, Human Resources, PEERS or other resources listed on page 15.

Respect



Respectful Work Environment:

Trinity Health is committed to creating and maintaining a respectful work environment for all associates, caregivers, physicians and visitors. Respect is a Trinity Health Core Value. As an associate, you should expect to be treated with respect. We also expect that you will treat everyone you encounter in our facilities with equal respect and fairness.

Trinity Health associates, physicians and others are not expected to tolerate disrespectful behavior in the workplace. Rather, such behavior should be reported via one or more of the following ways:

- Discuss the matter with your supervisor or contact human resources
- File a report in PEERS
- Discuss the matter with a higher-level manager in the organization
- Contact your Local Integrity Officer
- Contact the Trinity Health Integrity Line: 1.866.477.4661

Please note that Trinity Health maintains a strict non-retaliation policy for reporting a concern in good faith.

Conflict of Interest:

A conflict of interest exists whenever outside activities or relationships influence – or would appear to influence – your decision-making.

My Relationships With Vendors, Other Business Partners, and Competitors

Associates and other individuals working on behalf of Trinity Health have a duty to act in the best interest of the organization. This means avoiding situations where relationships with vendors or other business partners could appear to influence decisions you make involving Trinity Health.

Senior executives, as well as board members, must be particularly sensitive to actual or potential **Conflicts of Interest**. As a tax-exempt organization, transactions involving Trinity Health senior executives and board members are subject to special laws and regulations. Failure to follow these laws and regulations can result in significant fines and penalties against Trinity Health and the involved persons, including managers who authorize such activities.

What Is Expected of Me?

As an associate, contract worker, senior executive or board member of Trinity Health, you are expected to:

- Maintain a positive, courteous and customer-service oriented attitude when interacting with vendors and business partners
- Maintain objectivity and avoid actual or potential conflicts of interest that might interfere with your responsibilities in Trinity Health. When dealing with conflicts of interest, always remember that appearances do count!
- Always make decisions in the best interests of Trinity Health
- Follow Trinity Health's policies and procedures addressing conflicts of interest. In general, these policies require that you discuss and obtain the advance approval of your supervisor or higher-level manager for any situation that could present an actual or potential conflict of interest with your work in Trinity Health

- Follow Trinity Health's policies requiring annual disclosure of any actual or potential conflicts of interest, as applicable to your position

The following are a few examples of activities that can create a conflict of interest:

- **Gifts and Entertainment** – Associates, contract workers, senior executives and board members of Trinity Health may not offer, solicit or accept gifts or entertainment intended to influence decisions made on behalf of the organization. You should be aware of and follow your organization's policies concerning the acceptance of gifts and entertainment offered by vendors or others doing business with Trinity Health. You are expected to use common sense and good judgment when accepting or refusing gifts or entertainment. In general, any acceptance of entertainment offered by a vendor should be infrequent, connected to a legitimate business purpose (e.g. be of benefit to Trinity Health, rather than the individual), and not be of extravagant value.
- **Outside Employment** – In some cases, associates work for both Trinity Health and another company that either does business with or competes with Trinity Health. Before considering an offer to work for an organization that either does business with or competes with Trinity Health, you should discuss possible conflict of interest issues with your supervisor or higher-level manager.
- **Service on Outside Boards** – Associates are encouraged to actively participate in various charitable or civic organizations that benefit our communities. Before accepting an appointment to the board of any organization that may represent a conflict of interest, obtain the approval of your supervisor.
- **Financial Interests** – It is generally considered to be a conflict of interest to do business with, or recommend that Trinity Health do business with, a company in which you or a family member has a financial interest (excluding investments in large, publicly-held companies) or business relationship. Obtain the advance approval of your supervisor in all such situations.

FAQ

FREQUENTLY ASKED QUESTIONS

Q: I work full-time, 12-hour shifts, and would like to get some extra hours by working at a competing hospital in the area. Do I have to talk to my manager before I accept another position?

A: Before you consider an offer to work for a competitor of Trinity Health, discuss the situation with your manager to make sure no potential conflict of interest exists that would interfere with your responsibilities at Trinity Health. This is especially important for full-time associates.

Q: I recently received a call from a vendor seeking my input on a new product that is under development. The vendor will be holding an out-of-town meeting and has asked me to attend. The vendor is willing to pay my airfare, room and board for two days, as well as pay me for my time to attend the meeting at \$50 an hour. Can I accept the invitation?

A: Trinity Health's policies generally prohibit the acceptance of gifts, entertainment or other items of value, including payment of travel, lodging, and meal expenses, from vendors doing business with the organization. Exceptions may be allowed with the advance approval of your manager. Before accepting such an invitation, you and your manager should discuss the purpose of the meeting and the resulting expectation of the vendor as a result of your participation. If you are in a position to determine whether to purchase this vendor's product in the future, your participation in the meeting and acceptance of compensation and paid expenses by the vendor could be viewed as potentially influencing your decision-making. You should refer to your organization's and Trinity Health's policies and procedures for further guidelines and requirements.

Q: Vendors frequently visit our department and bring in new products/devices for our physicians to sample. The vendors always want to provide pizza lunches for the staff. I know the staff enjoy free lunches and the information provided by the vendors concerning their products and services is often helpful. Is it appropriate to accept free lunches from vendors?

A: You should consult your organization's policies concerning acceptance of gifts, such as paid lunches from vendors, and obtain the advance approval of your manager. In general, an occasional lunch provided by a vendor may be allowed when connected with a legitimate business purpose such as a product demonstration. The value of the lunch should not be extravagant and there should be limits on how often lunches are provided by vendors. The lunch should be made available to all staff members – not just to those who have a role in deciding to purchase or use the product or service.

Q: My sister-in-law is a health care 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. You should fully disclose your relationship to anyone that you recommend consider your sister-in-law for the project. You should not participate in the hiring decision, nor use your position to influence the outcome of the hiring decision. Also, you must not share information with your sister-in-law that other prospective vendors or consultants would not have.

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

A: No. Do not disclose confidential information learned through another job. We may not use this type of information in any business dealings. Further, it would be unethical to share confidential information you learn from your association with Trinity Health with a future employer should you leave the organization.



My Relationship With the Government and Other Payers

Health care organizations, including Trinity Health, are subject to numerous laws and regulations that impact how we deliver health care services. In addition, our federal and state governments are responsible for the payment of a significant portion of the health care services we provide to patients covered by the Medicare and Medicaid programs. Many laws and regulations are complex and challenging to apply in our rapidly changing industry. Nevertheless, Trinity Health is committed to fully complying with all laws and regulations that apply to our health care ministry.

What Is Expected of Me?

Whether you are an associate, contract worker, volunteer, medical staff member, senior executive, or board member of Trinity Health, you are expected to:

- Act with honesty and integrity in all your business activities involving Trinity Health
- Follow all laws and regulations that apply to your work and ask for assistance if you have questions about how they affect you. See page 15 “Where to Find Help” for a listing of resources available to answer your questions
- Follow all requirements of government (e.g. Medicare and Medicaid) and other third-party payers, such as insurance companies, who pay for the health care services we provide. These requirements generally include maintaining complete and accurate medical records, submitting only complete and accurate claims for services provided, and protecting the privacy and security of the health information we collect
- Participate in training and education offered by Trinity Health on those laws and regulations that apply to your work responsibilities
- Cooperate with any government investigation. Never, under any circumstances, destroy or alter documents requested as part of a government investigation, or lie or make false statements to a government investigator. In addition, never offer gifts or other items of value to government representatives

Do I Have a Relationship With the Government?

It may surprise you, but the answer is “yes”! While many federal and state laws and regulations that apply to our health care operations may not apply directly to the work you do, it’s important for you to be aware of these requirements and to understand how they affect our organization.

- If your work responsibilities include business activities with physicians or other organizations who refer patients to Trinity Health facilities, you must be familiar with and follow the laws and regulations that affect those business activities. These include the Stark, Anti-Kickback and IRS laws and regulations.

What is Fraud and Abuse?

There are many federal and state laws designed to protect government programs, such as Medicare and Medicaid, and other third-party payers such as commercial insurance companies, that pay for health care services. The Fraud and Abuse laws generally prohibit the following:

- Submitting inaccurate or misleading claims for services provided
- Submitting claims for services not provided
- Submitting claims that don’t meet payer requirements (e.g. coverage for services)
- Making false statements or representations to obtain payment for services or to gain participation in a program
- The offer or payment of money, goods or anything of value in return for the referral of patients to a health care provider
- Offering or giving something of value to patients to encourage them to use or purchase health care services

FAQ

FREQUENTLY ASKED QUESTIONS

What Does Tax-Exempt Status Mean?

A vast majority of Trinity Health organizations are not-for-profit, tax-exempt organizations operated exclusively for religious and charitable purposes. Care of the poor, community benefits and medical education are examples of the types of activities that support our charitable purpose. Our tax-exempt status requires us to follow a number of additional laws and regulations that generally prohibit the following:

- Paying more than “fair market value” for goods and services
- Providing goods or services to others at less than Fair Market Value, unless specifically allowed by federal or state law
- Improper use of organization assets for the benefit of board members, officers, senior executives and others in a position of substantial influence over the business activities of our organization
- Engagement of tax-exempt organizations in substantial lobbying activities
- Direct or indirect campaigning for or against the election of any candidate for public office, including the donation of organization funds to any political campaign

What is Fair Market Value?

In general, goods and services are at “fair market value” when their price is reasonable and consistent with current prices in the community for the same or similar goods and services. Contact your Legal Department or Local Integrity Officer if you have additional questions or need further guidance.

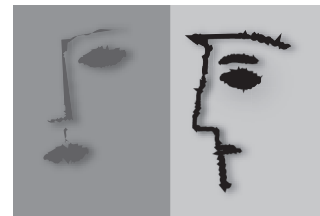
Q: While preparing a bill for submission to Medicare, I realized there are charges for services that I believe are inappropriate based on Medicare’s billing rules. Should I submit the claim anyway and let Medicare determine if the charges are appropriate or not?

A: It is inappropriate to submit bills to Medicare, or other payers, that do not meet the payer’s requirements. You should discuss this issue with your manager to determine an appropriate course of action. If an error is confirmed to have occurred, the claim should not be submitted for payment to the payer. If the error seems to be occurring regularly, the issue should be discussed with management responsible for the department or area involved so that appropriate actions can be taken to prevent the errors from occurring in the future.

Q: Medicare notified us of some inaccuracies in our billing. The specific bills at issue have been resolved. However, we haven’t changed our practices that caused the errors in the first place. What is my responsibility?

A: All of us have a responsibility to seek answers to our concerns. Speak with your manager to make sure you understand the situation. If you are still concerned that appropriate actions have not been taken to resolve the issue, contact your Local Integrity Officer or one of the other resources listed on page 15 for assistance.

Honesty



Q: In my work area, we refer many patients to local home care agencies for at-home services. One local home care agency recently offered to give us gift certificates in appreciation for our referring patients to their agency. Is this allowed?

A: No. Federal laws strictly prohibit health care providers from offering or accepting anything of value in exchange for the referral of Medicare and Medicaid patients. When making decisions about your patients, you must always consider what is best for the patient – not what’s in it for you. You should discuss this matter with a senior-level manager or your Local Integrity Officer so that appropriate follow-up can be taken with the home care agency.

Q: My job responsibilities require me to frequently interact with physicians on the medical staff. I understand there are specific laws and regulations that affect what the organization can and can't do for physicians. What are the rules and where can I find out more information?

A: You are correct that there are several federal and state laws and regulations that impact relationships with referral sources such as physicians. In general, it is inappropriate to offer or give gifts, gratuities or anything of monetary value to someone who is in a position to refer patients to a health care provider. Examples might include free supplies or equipment, office space, goods or services provided at less than Fair Market Value, or the write-off of a physician's accounts receivable balance or loan due to the organization. Trinity Health has specific policies that must be followed for all relationships with physicians. You should contact the Legal Department or your Local Integrity Officer to learn more about our policies and to further discuss your specific questions.

Q: May I respond to a government investigator who has asked about our organization's billing policies?

A: It is the policy of Trinity Health to cooperate and respond appropriately to any lawful government investigations. If such an inquiry is made while you are at work, immediately call your supervisor. It is appropriate for you to ask the government investigator for identification. Note the individual's name and the name of the agency he or she represents. Either you or your supervisor should immediately call your Local Integrity Officer. Never lie or attempt to deceive a state or federal government representative. You may elect to inform the individual that you do not wish to respond to questions until your supervisor or an attorney representing your organization is present. Do not destroy any documents that you think the investigator might be seeking.

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

A: No. Using Trinity Health's resources, such as bulletin boards, to participate or encourage participation in political activities is not allowed and could jeopardize the organization's tax-exempt status.



My Relationship With Trinity Health and the Communities We Serve

You also have a relationship with Trinity Health and the communities we serve. As with other relationships, there are certain expectations and commitments of both parties to the relationship.

What Is Expected of Me?

As an associate, contract worker, volunteer, senior executive, or board member of Trinity Health, you are expected to:

- Support Trinity Health's Mission and Values through your behaviors, actions, and decisions
- Create a culture that promotes our Preferred Culture Characteristics
- Represent the organization honestly and ethically in all your work activities and ask for assistance if you have questions. See page 15 "Where to Find Help" for a listing of resources available to answer your questions
- Properly use and protect Trinity Health resources including supplies, equipment, staff time and talents, and financial assets
- Use good judgment and follow your organization's policies for business travel and entertainment
- Prepare and maintain accurate and complete financial records including accounting, budgeting, time and attendance, expense and other financial data and information
- Retain all clinical, financial and associate records in accordance with Trinity Health record retention policies
- Respect the environment and follow your organization's policies for the handling and disposal of hazardous and infectious waste
- Properly use and protect the confidentiality of business or other information you use or encounter in your work with Trinity Health
- Maintain appropriate professional licenses, certifications and other credentials required of your position
- Commit to your ongoing learning and development through timely completion of education and training assignments

What Should I Expect from Trinity Health?

A relationship is not a one-way street. In recognizing your commitment to our organization, you should also expect Trinity Health to:

- Treat you with honesty, dignity, fairness and respect
- Provide you a meaningful, rewarding work experience
- Provide you a safe and supportive work environment free of harassment, intimidation or violence
- Provide encouragement and support for your continued learning and development
- Provide resources for your training and development to assist your understanding of the various laws, regulations and organizational policies that apply to your work
- Promote a respectful work environment that allows you to freely ask questions, seek clarification when needed, and raise issues and concerns in good faith without fear of harassment or retaliation
- Have your requests for information, input or assistance responded to in a timely and supportive manner

FAQ FREQUENTLY ASKED QUESTIONS

Q: A group of cardiologists have approached my hospital and indicated that they have performed the most open-heart surgeries in the state and have the highest success rate. Is it permissible to include this information in a marketing announcement for our new open-heart center?

A: The answer depends upon the truthfulness of the information – which requires your organization to verify and distinguish opinion from fact before marketing. In any event, the announcement should highlight services provided by the organization rather than by the individual physicians. Marketing materials must accurately represent the services our organization can provide, either directly or by contractual agreement.

Q: A patient on my unit has expressed racial preferences with regard to particular care providers. How should I respond to her request?

A: It is inappropriate to grant patient requests for particular providers solely on the basis of patient preference for a particular race. Your organization should not accommodate patient requests that would cause it to be discriminatory on the basis of race or ethnicity. Further, you should explain that the values of the organization do not allow race-based assignments and that the care provider who has been assigned to the patient is qualified to provide the best care. You may ask your human resources department whether there is a guideline or policy that applies to this particular patient care situation.

Q: I supervise an associate who witnessed a co-worker giving the personal health information of a patient to a patient's relative who was not authorized to receive the information. What are my obligations in this circumstance? Should the patient be informed there has been a breach of confidentiality?

A: This matter should be referred to your local Privacy Official or Local Integrity Officer for appropriate follow-up with those individuals involved.

Q: I am aware of an associate in my department who regularly uses the Internet at work for personal activities. I am not in a position where I must "police" others in my department and their use of time on the job. What should I do?

A: It is the responsibility of each associate to preserve the resources or assets of the organization. These assets or resources include supplies, materials, equipment, information, intellectual property and time. All of these are to be used for business purposes only. You should discuss the issue with your supervisor or Local Integrity Officer, or use one of the other resources available to you on page 15.

Questions to Ask Yourself: When faced with a difficult issue or situation where you are unsure what to do, the following questions may assist you in making the right decision:

- Is the decision inconsistent with the Mission and Values of Trinity Health?
- Will the decision affect the quality of patient care?
- Would I be comfortable telling my family about the decision or having it described on television or in a newspaper?
- Could the decision impact the reputation of Trinity Health if made known to the public?
- Could the decision negatively impact commitments the organization has made with associates, physicians or the communities we serve?
- Is there something about the decision that bothers me, makes me feel uncomfortable, or just doesn't "feel right"?

If the answer to any of these questions is "yes," seek the assistance of one of the resources listed within this document (see page 15).

Fairness

WHERE TO FIND HELP

Delivering health care services is an increasingly challenging task, with complex and ever-changing rules and regulations that apply to our operations. As a result, there will likely be times when the answer to a particular issue or situation is not clear. As an associate of Trinity Health, you are responsible for seeking answers to your questions or concerns. Fortunately, many resources and options are available to assist you.

Resources

Your Supervisor or Manager – This is usually the best place to start in getting answers to your questions. Because this individual understands the work you do, he or she may already have the information you need or can direct you to the right resource.

Higher-Level Manager – If you are not comfortable asking your supervisor or manager, or do not agree with the answer you receive, consider discussing the issue with a higher-level manager in your organization.

Human Resources – Your organization's human resources staff can likely answer many of your questions, including assisting you in addressing workplace-related concerns.

Mission/Pastoral Care/Clinical Ethics Resources – Certain matters involving patient care, including questions involving advance directives, end-of-life issues, and patient rights may be appropriate to address with your local mission, pastoral care and/or clinical ethics resources.

Medical Staff Affairs Office – If you are a physician, you are encouraged to contact your organization's Medical Staff Affairs Office to discuss any issues or concerns you may have.

Risk Management and Safety Departments – If you have questions or concerns related to patient care or workplace safety, you may also contact your local risk management and/or safety departments.

Privacy and Security Officials – Contact your organization's Privacy and Security Officials if you have questions or concerns related to the use and/or protection of patient health or confidential business information.

Your Local Integrity Officer – Your Local Integrity Officer is a member of senior management responsible for the operation of the Organizational Integrity Program in your organization. Your Local Integrity Officer can assist you in obtaining answers to your questions and concerns. Your Local Integrity Officer contact information is located on page 16.

Integrity Line – We encourage you to use one of the resources above to address your questions and concerns. However, if you are not comfortable using any of these resources, or if these resources have not fully resolved your concern, you can call the Trinity Health Integrity Line at 1.866-477.4661 or you may file a report online at www.mycompliancereport.com.

PEERS – If you have a concern, you may be able to use Trinity Health's PEERS system to report the issue. PEERS is available in most Trinity Health hospitals. If PEERS is not available in your organization, utilize your organization's existing incident reporting process to share your concerns.

PEERS: Trinity Health's Potential Errors and Events Reporting System is designed to help associates and medical staff document near-misses and errors or events data, anonymously if desired. Designed by clinical staff and physicians, it is available in many Trinity Health hospitals through the Intranet.



Remember:

The most important thing you can do is to keep asking questions until you are comfortable with the answer.

Trinity Health Integrity Line: 1.866.477.4661

Integrity Line: The Integrity Line is staffed 24 hours a day, seven days a week by an outside organization on behalf of Trinity Health.

When you call the Integrity Line, you will speak with an individual trained to listen to your concerns and to gather as much information from you as possible. If you prefer to submit your concern online, you may do so at www.mycompliancereport.com. When prompted for an access ID, please use THO. Either way, your report will not be traced or recorded, and the Integrity Line does not use Caller ID.

When submitting a concern through either the Integrity Line or online system, you may choose to remain anonymous. Your report will be provided to the Trinity Health Organizational Integrity Officer for review and investigation, in most cases with the assistance of the Local Integrity Officer for your Ministry Organization. Throughout the process of reviewing your concern, the information you provided will be treated confidentially. You will be provided a call identification number for you to check back later on the status and ultimate resolution of your issue.

Non-Retaliation Policy

Ultimately, it is your responsibility to report issues and concerns. We understand that you may not wish to report concerns if you feel you may be subjected to retaliation or harassment. Trinity Health's policy strictly prohibits retaliation, in any form, against an individual reporting an issue or concern in good faith. Retaliation is subject to discipline, up to and including dismissal from employment, suspension of medical staff privileges, or termination of business relationships, as applicable, in accordance with Trinity Health's policies.

The Local Integrity Officer for Your Organization is:



Acknowledgement and Certification

I acknowledge that I have received a copy of the Trinity Health Standards of Conduct. I agree to read the Standards of Conduct and discuss any questions I have with my supervisor, a higher-level manager, or other individuals responsible for my relationship with the organization.

I agree to abide by these Standards of Conduct during the course of my employment, medical staff appointment or other business relationship with Trinity Health. I understand that I will be held accountable for my actions and behaviors inconsistent with the Standards of Conduct. Violations could result in disciplinary action, up to and including termination of employment, suspension of medical staff privileges, or termination of business relationships, as applicable, in accordance with Trinity Health's policies.

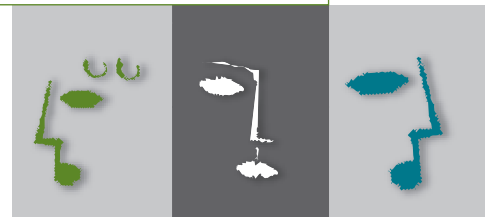
Name: (please print) _____

Department: _____

Organization: _____

Signature: _____

Date: _____





Preferred Culture Characteristics

Mission-Centered

The Catholic identity of Trinity Health and the Mission and Core Values that arise from it permeate the organization's culture. A comprehensive understanding and commitment to the Mission guides care for patients, relations with colleagues, operational and financial management, and community engagement. All who work in or represent Trinity Health strive to carry out the Mission. Leaders assure that the mission is integrated into all decision-making. Commitment to personal integrity is evident in the system's policies and behaviors. Trinity Health honors the heritage of its founders and acts in harmony with the Church. Associates appreciate the spiritual aspect of Trinity Health's work, and the organization respects their spirituality. Trinity Health looks for opportunities to partner with Catholic health and social services organizations and others who share its values.

Customer-Focused

Trinity Health is a learning organization with a bias for action. It focuses on improving the compassion and quality of its patient care and service by understanding their needs, sharing, and adopting best practices and measuring outcomes. The system and its members are flexible and agile in meeting the challenges inherent in health care. To this end, Trinity Health develops its leaders – sponsors, board members, managers, and clinicians – by improving their skills and competencies. People in Trinity Health try different ways of operating and advancing the Mission without fear of making mistakes. Associates are empowered to take action to meet or exceed customer expectations. Trinity Health strives to be an employer of choice.

Interdependent

Relationships of governance and management; the Home Office and Ministry Organizations, and between Ministry Organizations are interdependent. Each respects the needs and requirements of the other in their work. These groups understand that dynamic tension between constituencies is to be expected and helpful. They focus their decision-making on enhancing the common good. Representative stakeholders make decisions through well-understood processes with appropriate speed efficiency and participation. Each decision is made at the place in the organization where the necessary knowledge and experience reside. Interdependence is a key goal when Trinity Health seeks partnerships to grow and fulfill the mission.

Open Communication

A multi-directional communication process serves everyone in Trinity Health. Information is available and accessible on a timely basis. Everyone takes responsibility to stay informed, provide feedback, and share opinions. People communicate openly and directly. Active listening and candid speaking are skills used and valued by all. These practices promote norms of freely exchanging ideas in the interest of finding better ways to accomplish goals and sharing different points of view to arrive at constructive agreement.


Socially Responsible

Trinity Health will assess, respond to, and account for meeting the needs of the communities it serves. To do this it joins with people from those communities, including representatives of those who are poor and underserved. The organization engages in social analysis and advocacy for the advancement of a social justice agenda that includes ecological concerns. Trinity Health values diversity in hiring and practices are established to ensure that the benefits of diversity are realized throughout the organization.

Culture ■ ■ ■



Integrity



■ ■ ■ *But as for me, I will walk in my integrity.*

PSALM 26:11



MISSION

We serve together in Trinity Health, in the spirit of the Gospel, to heal body, mind and spirit, to improve the health of our communities and to steward the resources entrusted to us.

CORE VALUES

Respect, Social Justice, Compassion, Care of the Poor and Underserved, Excellence