CODE OF CONDUCT

February 2024

uchealth

Dear UCHealth Team Member,

UCHealth's staff members, providers, volunteers and leaders take great pride caring for each and every patient who walks through our doors. Our mission is to improve lives, and every day, we are making positive impacts in the communities we serve and for our patients, visitors and team members. You are essential to this mission.

Improving lives requires that we do what is right and ethical. UCHealth asks that you become familiar with and follow the UCHealth Code of Conduct because we believe it's the framework for an organization that prioritizes respect, kindness and excellence.

The code of conduct is our cultural compass, providing guidance to ensure that our work is accomplished in an honest way that everyone deserves. It demonstrates our integrity as we strive to care for our patients and realize our company's vision of moving from health care to health.

Thank you for your dedication to our mission, vision and values and your commitment to making the right choices.

Sincerely,

Elizabeth B. Concordia

Elizabeth B. Concordia
President and CEO, UCHealth

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Mission, Vision, Values and Values in Action

Mission

We improve lives. In big ways through learning, healing and discovery.
In small, personal ways through human connection. But in all ways, we improve lives.

Vision

From health care to health.

Values

Patients first
Integrity
Excellence

Values in Action

We take care of others by taking care of ourselves.
We always prioritize safety.
We connect with compassion and respect.
We act inclusively so those with diverse ideas and perspectives are supported.
We speak up when there's an opportunity to make things better.
We provide extraordinary care and service by being accountable for our actions.
We strive for excellence in our work, and when we fall short, we learn and improve.

If you ever have a question, don't hesitate to reach out.

It's important that every person within UCHealth knows that they are free to raise concerns, ask questions or seek help with regard to the code of conduct and the information that follows. We have a policy of no retaliation, and reaching out in good faith will never impact your job.

The following are ways you can report a concern or ask a question:

- Consult with your leadership
- Human Resources Business Partners
  - HR service center
- Use the Integrity Helpline for HR, compliance or privacy concerns or inquiries
  - On the web: uchealth.org/integrity
  - Via mobile: uchealth.org/integrity-mobile
  - Call 1.855.824.6287
- RL Solutions for clinical safety
  - The Source>Clinicians>Safety Reporting - RL

At UCHealth, we follow the rules.

We bring people onto the UCHealth team whom we trust to do the right thing. We want to ensure that you have the resources you need to meet these expectations so this code of conduct has some information and links to related policies, followed by an FAQ section. However, this document is not exhaustive, so please use the contact information provided for more information. You may search for policies in UCHealth PolicyStat.

We take care of our patients, ourselves and one another.

UCHealth and University of Colorado Hospital Authority are proud to be equal opportunity/affirmative action employers that take deliberate steps to recruit, accommodate and maintain a diverse workforce.

We want UCHealth to be a healthy environment where everyone feels safe—which means there's no place for violence, harassment or threatening behavior. Team members are expected to treat each other with respect through courteous communication and professional demeanor.

Related policies and resources:

- Environment of mutual respect
- Diversity, equity and inclusion
- Alcohol- and Drug-Free Workplace Policy
- Workplace-Violence Prevention Policy
- Prohibition of Concealed Firearms Policy

Three requirements for an inclusive workspace:

1. People are treated with respect.
2. People are valued for their strengths.
3. Everyone does the right thing because it is the right thing to do, whether anyone is watching or not.

Preventing false claims and ensuring accuracy in records, coding and billing supports great patient care.

UCHealth takes issues regarding false claims, fraud and abuse seriously and follows all applicable laws and regulations. Excellent patient care depends on accurate record-keeping, coding, billing and claims submission. We require entities and physicians within UCHealth to bill and submit claims only for services that are actually provided and medically necessary.

To maintain a high level of ethical business activities, we conduct ongoing reviews of coding and billing practices to ensure accuracy. Individuals who report in good faith violations of the laws and/or possible false claims submitted by their employers are protected from retaliation of any kind.

Related policy:

- Federal and Colorado False-Claims Statutes Policy

Patient rights and privacy under the Health Insurance Portability and Accountability Act (HIPAA).

All UCHealth workforce members are responsible for protecting our patients' privacy and Protected Health Information (PHI). Only the minimum necessary PHI should be accessed or shared. Please keep the following in mind when accessing PHI:

- **Do** access PHI for Treatment, Payment or Health Care Operations (TPO) needs.
- **Do** check patient identifiers prior to releasing PHI to ensure you have the correct patient.
- **Do** dispose of paper PHI appropriately by using a secured bin to ensure it is properly destroyed.
- **Do** protect electronic PHI by locking your UCHealth workstation and keeping your log-in credentials (user name and password) secure.
- **Do not** obtain, view or share PHI of any patient without a TPO need.
- **Do not** use a personal mobile device to capture images where patients or PHI are visible.
- **Do not** share PHI on social media channels.

We should also note here that while, as an employee, you may access and view your own PHI via Epic, policy prohibits you from editing or altering it in any manner.

Related policies:

- Patients' Rights to Access Their Designated Record Set Policy
- Notice of Privacy Practices Policy
- Disclosures of Protected Health Information to Law Enforcement Policy
- Disclosure of Protected Health Information to Military and Federal Officials Policy
- Mobile Device Usage Involving Protected Health Information Policy
- HIPAA Sanctions Policy
- Workforce Member Self-Access to Own Protected Health Information Policy

What is considered PHI?

PHI includes 18 identifiers including, but not limited to:

- Name
- Contact information
- Geographic location smaller than the state
- Vehicle identifiers
- Full-face images
- Biometric identifiers like fingerprints or voice
- Any other unique identifying number or characteristic

Use of technology requires responsibility.

All of us rely on technology to do our jobs the right way. IT tools also require responsibility as we use technology and as we represent ourselves and UCHealth while communicating on social media and email. It can be easy to feel anonymous or detached from our actions when we're behind a screen, so it's important to act as we would face-to-face, treating everyone with respect, kindness and privacy.

Related policies:

- Acceptable-Use Policy
- Access to Internet Services Policy
- Social Media Policy

Avoid conflicts of interest for everybody's sake.

UCHealth team members are expected to always conduct business fairly and should avoid relationships or activities that might interfere with their ability to do so. If you have outside activities or personal interests that influence or appear to influence your ability to make objective decisions on the job, a conflict of interest might exist.

Related policies:

- Conflict-of-Interest Policy

Gifts, gratuities and entertainment could cause trouble.

We understand that, when caring for patients, bonds can form, and it's natural for people to want to express gratitude in the form of gifts or rewards. Unfortunately, if a patient or guest tries to offer something like cash, gift cards, favors or anything of value, you should try your best to refuse or return it. If you're finding it difficult to do so, you can reach out to your supervisor or compliance or contact your hospital's foundation about making a donation. The rules around exchanging gifts extend both ways and apply to settings outside of patient care such as between team members and vendors or government employees. The good news is that personal gifts between team members are not prohibited.

Related policies:

- Gift Policy
- UCHealth Sponsored Celebrations and Gifts Policy

Maintaining appropriate relationships with our vendors.

It is UCHealth's expectation that all vendor representatives adhere to UCHealth policies and procedures while on site at a UCHealth or UCHealth-operated facility, including adhering to any health requirements as determined by UCHealth, governmental agencies or other regulatory bodies.

Requirements include:

- Vendor representatives must have a scheduled appointment before coming on site at any UCHealth/UCHealth-affiliated sites of care.
- New product requests must originate from a UCHealth team member and go through the value analysis process. Invoices for products that do not go through this process will not be paid.
- All equipment and purchased services require an authorized purchase order or executed contract issued by supply chain. Payment may be refused on equipment or services that do not go through this process.

Vendor-sponsored training or education is complicated and should be assessed on a case-by-case basis. Essentially, free vendor-sponsored training or education, including travel and lodging, may be accepted if the business value to UCHealth outweighs the entertainment value of the training event, and if you receive the appropriate approvals before participating.

Related policies and resources:

- Vendor-Representative Policy
- Supplier-Diversity Page/Registration
- Vendor Information
- Industry-Sponsored Interactions Policy

Physician interactions, referrals and legal restrictions.

The federal Anti-Kickback and physician self-referral law or "Stark" Law governs many of our interactions with physicians and prohibit remuneration, directly or indirectly, in any form for the referral of patients or business covered by state or federal health care financing programs, e.g., Medicare. Further, the Stark Law prohibits referrals for certain items and services furnished by an organization with which the referring physician, or his or her immediate family member, has a financial relationship, unless a specific legal exception applies.

One exception to the Stark Law is non-monetary compensation. Non-monetary compensation may be given to physicians as long as the total given does not exceed a specific dollar amount per year. Team members must strictly follow our organization's policies when offering non-monetary compensation or other incidental benefits to physicians or their immediate family members.

All agreements involving patient referral sources, including physicians, hospitals, ambulance services and other health care organizations and service providers, must be reviewed and approved in accordance with our Contract Management policy.

Related policies:

- Physician-Owned Entities and Distributorships Policy
- Non-Monetary Compensation and Medical Staff Incidental Benefits Policy
- Contract-Management Policy

Research is an important part of our Mission.

At UCHealth, we conduct hundreds of clinical trials (also called research trials or research studies) in our ongoing effort to discover and deliver more effective treatments, while strictly adhering to high ethical standards and complying with federal and state laws as well as all UCHealth policies. UCHealth protects all patients and respects their rights during research projects. All individuals asked to participate in a clinical trial or research project are given a full explanation of the risks, expected benefits and alternatives to volunteering for a clinical trial during their consent process. An individual's refusal to participate in a research study will not compromise his/her access to services.

Any person engaging in human subjects' research at any UCHealth facility must obtain Institutional Review Board (IRB) approval and Research Administration approval prior to the research taking place. Researchers using investigational drugs in their studies need to partner with pharmacy to ensure that applicable policies and procedures are followed and regulatory requirements are met. Researchers using investigational devices need to follow all fiscal and supply-chain requirements at UCHealth. For further information, please contact Research Administration at UCH-ResearchAdmin@uchealth.org.

Related policies:

- Research Conflict of Commitment and Conflict of Interest Policy
- Research Informed Consents and HIPAA Authorizations in Epic Policy

There are some unique requirements around engaging in political activities.

UCHealth and University of Colorado Hospital Authority (UCHA) are restricted by law from endorsing, financially supporting or campaigning for candidates for public office or supporting or opposing ballot initiatives, referendums or recall elections. Everyone who works for UCHealth is prohibited from actively engaging in any campaign or related activity as a representative of UCHealth, but may engage in such activities as a private citizen. Further, any campaigning or related activity cannot occur during work hours nor may any UCHealth resources or equipment (such as copy machines, computers, email) be used to participate in a campaign, ballot initiative or recall.

Accuracy in timekeeping, payroll and expense reporting is a must.

UCHealth team members who use the time and attendance system and submit expense reports must do so completely, accurately and on time. When submitting payroll or expenses, you are attesting that your time and expenses were for legitimate business on behalf of UCHealth. Your supervisor's or manager's signature or electronic approval of a payroll record or expense report confirms that it has been reviewed. It also confirms that the reported hours or expenses have been verified and correctly allocated. Contact Human Resources with questions on payroll and expense reimbursement.

Related policies:

- Timekeeping and Scheduling Policy
- Travel and Business-Related Expenses Policy

Contact us

- Compliance
- HR service center
- Integrity Helpline
  - On the web: uchealth.org/integrity
  - Via mobile: uchealth.org/integrity-mobile
  - Call 1.855.824.6287
- Privacy
- UCHealth policies on PolicyStat

Recreational Therapist
uchea

FAQs

1. **Why are the Values in Action important?**

   We believe that teamwork, service and communication are at the core of our organization's commitment to delivering quality patient care. The Values in Action were developed to reflect UCHealth's commitment to service excellence. By making an official commitment to practice these standards, we reinforce them, acknowledge that they are expected behaviors and encourage UCHealth team members to practice them diligently.

   Every year, you will be assessed on how well you demonstrate our Values in Action and corresponding values through your work. You will set individual goals to support our strategic objectives.

2. **We had a patient get very stressed the other night, and they took their frustrations out on the staff. I had to yell loudly at them to bring the situation back under control. Under the circumstances, this is normal, right?**

   No. Neither person's actions are normal or acceptable. Patients have a responsibility to always treat UCHealth's staff members and providers with respect. Our actions must always be guided by our values in action. We serve others with courtesy, compassion and sensitivity. Patients are often frightened, nervous and stressed, and it is our duty to respond with compassionate care to every patient in every situation. When a patient treats a UCHealth team member with lack of respect, or verbally or physically threatens or assaults a staff member or provider, staff members should respond appropriately by alerting security, calling a code gray or alerting their supervisor.

3. **I work in a clinic where a family member of one of my patients has been using abusive language with me over the past two visits. I don't feel like I should have to tolerate that, but how can I say anything since good customer service is so important?**

   While good customer service should be foremost in all of our minds, no one should have to tolerate abusive language from our patients or visitors. If you feel uncomfortable saying anything to the family member, you may let your supervisor or the physician know, and they will handle this situation. The hospitals and clinics have patient representatives who can also help with difficult issues.

4. **Every time a particular doctor is on duty, I do everything I can to avoid calling them with a question. Last time I called, they yelled at me and made some very rude comments. I'm afraid to report this, because this physician could get me fired. What should I do?**

   An individual who feels they have been the victim of any type of harassment or inappropriate conduct should report the conduct to their supervisor, the Human Resources department or the Integrity Helpline. All reports of unprofessional behavior will be investigated. No disciplinary action or retaliation will be taken against an individual for reporting in good faith a perceived issue, problem, concern or violation.

5. **I have worked with some of the people in my department for many years. They are always joking with me, but sometimes their comments make me feel uncomfortable. As long as their statements do not threaten my job, their statements are not sexual harassment, right?**

   Whether or not someone's actions meet the legal definition of sexual harassment, you should not be subjected to any behavior that makes you uncomfortable or that you feel is inappropriate on the job. You should report the actions immediately to your supervisor, Human Resources or the Integrity Helpline.

6. **There are so many changes to laws and regulations. How can I be sure that my department knows about the changes and is in compliance with all of these laws?**

   While the number of changes in the law might be overwhelming, we have a responsibility to understand and obey them. Every department leader is responsible for ensuring that all of his/her staff are aware, understand and follow relevant laws and regulations. As a UCHealth team member, you are responsible for attending meetings and reading any materials provided to ensure that you understand and comply with applicable laws. If you have questions concerning a law or regulation or whether it applies to you, please speak with your supervisor or compliance.

7. **How do I know if my conduct is ethical?**

   If you are worried about your actions being discovered, feel a sense of uneasiness about what you are doing or feel the need to rationalize your activities (such as believing "everybody does it"), take the time to reconsider your actions. Stop, step back and consider what you are doing. Consult a manager for advice and change your behavior if appropriate.

8. **I have been with UCHealth for a long time. Even though the helpline is confidential, could the operators recognize my voice?**

   An outside service is used to answer all calls made to the helpline number. The person answering the phone is not a UCHealth team member.

9. **I don't want to get someone fired; I just want fair treatment in my department. Should I call the Integrity Helpline, or is there a better way to resolve the problem?**

   It is great if you can resolve an issue first with your immediate supervisor or director. If you cannot do this successfully or if you do not feel comfortable talking to them, you may make a confidential report on the Integrity Helpline via the web, mobile device or by phone.

10. **I have seen a certain person taking medications that were intended for patients. I believe the medications may have been narcotics. I am afraid of reporting this because the person will know who has reported it.**

    The person who is taking medications that are intended for patients must be reported. If you have any concerns about reporting to your immediate supervisor or director, report your concern through the Integrity Helpline.

11. **Does UCHealth conduct drug testing?**

    UCHealth performs random drug testing on all safety-sensitive positions. Drug testing is also conducted on all prospective employees.

    If a supervisor or manager has reason to suspect a UCHealth team member is under the influence of drugs or alcohol while working, the team member may be required to submit to alcohol and/or drug testing. This is a condition of employment, and failure to comply with these requests or a positive test is grounds for corrective action up to and including termination.

    UCHealth is required to adhere to federal, state and local laws and regulations regarding alcohol and drug use. UCHealth also has a vital interest in maintaining a safe, healthy and efficient environment for its employees and the public. Being under the influence of, subject to the effects of or impaired by alcohol or drugs while on the job might pose serious safety and health risks to the user, the user's coworkers and the public. In addition, the possession, use or sale of an illegal drug in the workplace could pose an unacceptable risk to the safe, healthy and efficient operation of UCHealth.

12. I have a concern that one of the billing staff in my area is not complying with established billing guidelines. Should I report this to my supervisor, or should I wait to see if the errors are discovered later?

You should report this to your supervisor or to the Integrity Helpline immediately. The concern will be researched and handled appropriately. It is important that all billing guidelines are followed. We have a non-retaliation policy that will protect you in reporting your concerns in good faith.

13. A patient is upset because their insurance will not pay for their routine physical. They tell the receptionist, "If you just change the code to 'high blood pressure,' my insurance will pay it." Should I change it so the claim gets paid by insurance?

No. If their visit was for a routine physical, it would be fraudulent to change a code for the sole purpose of collecting a payment. Physician documentation for the patient visit must match the diagnosis code so that an accurate claim will be submitted to insurance for payment.

14. I have a friend who works at another hospital, and we often get together and share stories about work. Is this wrong?

No, as long as the stories are general in nature. However, certain types of information would be inappropriate for discussion. For example, sharing of information that would breach patient confidentiality or that is proprietary to UCHealth and its entities (e.g., prices, costs, terms, business policies and plans, etc.). This type of information sharing is unethical and, in some cases, illegal. Such discussions must be avoided.

15. I want to find out when my coworker's birthday is, and I know he has been a patient recently. Is it okay to look it up in our electronic health record?

No. It is never appropriate to access a patient's medical record for personal reasons. Patient information should only be accessed, used or disclosed for treatment, payment or health care operations purposes.

16. I noticed a few people in my work area who routinely fail to log off, especially when they're using the shared computers. The next person uses the computer under the previous person's ID. I recognize that most of my coworkers are authorized to access PHI and have the same computer-access permissions. I also know that it can take a minute or two to log on, time that adds up over a fast-paced day. I'm tempted to report this because I know this behavior is a policy violation. Is my concern warranted, and should I act on it?

You are right to be bothered by this behavior. Despite the time savings, failure to log off and/or use of someone else's access are both violations of UCHealth policies and HIPAA privacy and security rules. Further, the HITECH Act breach notification rule, members of the workforce are responsible for reporting anything that could be, or could lead to, a privacy or security violation. This is for the benefit of patients and the organization, therefore you should not hesitate to report this behavior.

17. I work in our emergency department, and I am considering starting a business selling resuscitative equipment over the Internet. Is this considered a conflict of interest?

This type of second employment might be a conflict of interest. You should consult your department director and the compliance department for review before proceeding.

18. A local vendor has offered to pay for some of our staff to attend a conference to learn about a new product. They will pay all travel expenses. Is this a conflict of interest?

Accepting this offer could be construed as accepting a gift of greater than nominal value or an inducement to conduct business with that vendor and should not be accepted. If UCHealth feels that learning about the product is worthwhile, the health system may approve paying for your staff to attend. When in doubt, discuss the situation with your director and the compliance department.

19. I was offered a $100 gift certificate from a drug representative as a thank-you for connecting them with the physicians and having their drug prescribed on a regular basis. Am I allowed to accept the gift card?

Gifts in the form of monetary compensation (cash or cash equivalents such as gift cards) are not allowed. It is also not acceptable to receive gifts of any kind for the purpose of influencing a decision.

20. I have been asked to give a presentation to a professional group on a day during my work time. They have offered me an honorarium. Can I accept an honorarium?

You must decline such payment or donate it to a UCHealth foundation because you are speaking during your regularly scheduled work hours. You may accept honorariums only if (a) the speaking engagement is unrelated to your employment role (past or present); (b) you are not speaking on behalf of UCHealth; and (c) you prepare and provide the presentation on your own time or during approved PTO time. Be sure you get prior approval from your department supervisor or director and the compliance department.

21. A vendor has offered to provide free equipment to UCHealth if we buy a certain number of catheters. Is UCHealth permitted to accept that vendor's offer?

It depends. If you receive an offer from a vendor to provide free services or equipment, discounts or other incentives, contact supply chain to determine if it is appropriate to accept the terms offered.

22. A doctor promises the hospital five admissions per week in exchange for a nurse to work in their clinic 20 hours per week for no charge. Is this agreement legal?

No. Providers should avoid giving or accepting anything of value in exchange for referrals. If the doctor would otherwise have to pay the expenses for a nurse to work in their office and the hospital provides it for free, this would be considered a benefit to the doctor. A promise of patient admissions to another entity in exchange for a benefit and/or compensation is both illegal and unethical.

23. I would like to give a referring physician in the community a gift card to thank them for all of their hard work this year on a quality project. Is this allowed?

No. Monetary gifts like cash or cash equivalents, including gifts cards, are not allowed. Physicians may receive up to a certain amount in non-monetary gifts such as tickets to an event or a golf shirt.

Each hospital has a designated individual who keeps a log of all non-monetary gifts given to physicians (or their offices). Before you decide to give a gift to a physician, check with the administrative assistant for your hospital's CEO to ensure the annual non-monetary limit will not be exceeded. Once the annual limit has been reached, no gifts can be given to or accepted by that physician. Violations of this rule can trigger problems for both the giver (i.e., the hospital) and the recipient (i.e., the physician).

24. I am working on a project but do not think that it is really research. How can this be determined?

Only the IRB can determine whether a protocol is exempt from IRB oversight. The regulations define a human subject as a living individual about whom an investigator (provider, staff or student) obtains data either through intervention or interaction with the individual or through identifiable private information (e.g., school transcripts or medical records). All protocols involving human subject research must be reviewed and approved by the IRB prior to starting any research activities.

25. I understand that UCHealth does not endorse political candidates or parties, but why does the hospital sometimes endorse ballot issues or other legislative efforts?

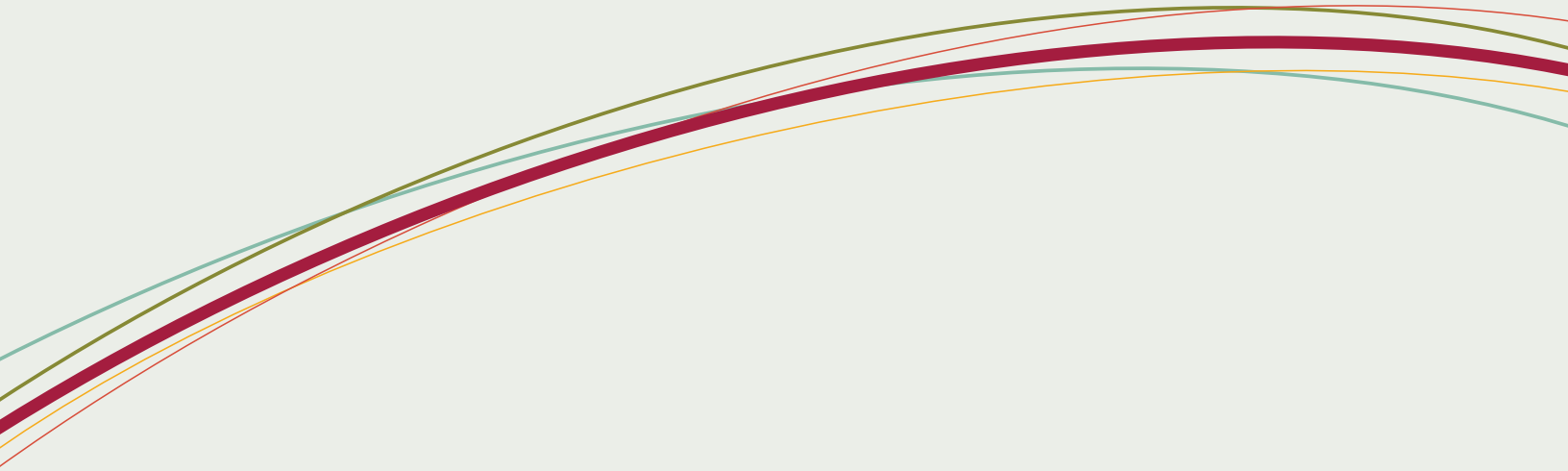
To remain tax-exempt, UCHealth must refrain from endorsing political parties or candidates, but it is perfectly legal and appropriate for the health system to lend support to issues or efforts that promote positive outcomes for our patients and patients' health and to oppose efforts that do not.

26. Our department is putting together an outreach program that we believe would be of interest to the community. Can I call the newspaper and give them the details?

No. All external or internal communications must be coordinated through the marketing and communications department. All announcements to the public about UCHealth programs must be handled by the media relations team. Other activities that you would have to discuss with marketing and public relations include, but are not limited to:

- Any paid advertisement or development of campaigns to increase market share for your program among patients and consumers.
- Participation in an interview with news media or responding to a reporter's questions.
- Assistance with deciding how to publicize your program.
- Development of community outreach programs.
- Creation of a website and any other marketing collateral on behalf of UCHealth programs.

Always be sure the marketing team is aware of any UCHealth-sponsored events, digital or printed collateral and web presence so they can ensure that you use the logo correctly, adhere to brand and graphic standards and effectively communicate your message on behalf of UCHealth.



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