



OSF[®]
HEALTHCARE

Code of Conduct



TABLE OF CONTENTS

OSF MISSION, VISION AND VALUES

LETTER FROM THE CEO AND THE CHAIRPERSON

OSF COMMITMENT TO INTEGRITY AS A WORK OF THE CHURCH

GUIDING PRINCIPLES

KEY TAKEAWAYS

● COMMITMENT TO SERVING EACH OTHER WITH RESPECT

Ethics	9
Safety and Security	10
Treating Others with Respect	11
Reporting Compliance Concerns	12
Open Communication	13
Hire Those Qualified to Work	14
Diversity	15
Drug and Tobacco-Free Workplace	16

● COMMITMENT TO SERVING OUR PATIENTS WITH THE GREATEST CARE AND LOVE

Quality Care and Patient Safety	18
Patient Rights	19
Patient Involvement	20
Professionalism	21
EMTALA	22
Clinical Research	23
Safeguarding PHI	24
Data Security	26

● COMMITMENT TO DEALING FAIRLY WITH GOVERNMENT REGULATORS, CONTRACTORS AND VENDORS

Compliance with Laws and Regulations	28
ACO Compliance	29
Complete and Accurate Documentation	30
Accurate Billing and Coding	31
Stark Law/Anti-Kickback Statute	33
Beneficiary Inducement	34
Grants	35
Controlled Substances	36
Document Retention	37
Conflicts of Interests	38
Relationship with Vendors	39

● COMMITMENT TO FOSTERING STEWARDSHIP OF OSF RESOURCES

Serving Our Communities	41
Appropriate Use of OSF Resources	42
Confidential Information	43
Marketing Practices	44
Environmental Compliance	45
Innovation	46

OSF Mission, Vision and Values



MISSION

In the spirit of Christ and the example of Francis of Assisi, the Mission of OSF HealthCare is to serve persons with the greatest care and love in a community that celebrates the gift of life.

VISION

Embracing God's great gift of life, we are one OSF Ministry transforming health care to improve the lives of those we serve.

VALUES

- Justice
- Compassion
- Integrity
- Teamwork
- Employee Well-Being
- Supportive Work Environment
- Trust
- Stewardship
- Leadership

Dear Mission Partners,

Each of you contributes to the OSF Vision of transforming health care to improve the lives of those we serve. We are proud of our accomplishments in the delivery and quality of care, the expansion of our Ministry and our health care innovations. We look forward to building on these achievements as we face new and exciting challenges in health care delivery.

This Code of Conduct is a resource to help you navigate the rules and regulations that apply to OSF HealthCare and its Mission Partners in the rapidly changing health care regulatory environment. It sets forth the basic principles with which we are all expected to comply. The Code explains ways you can find the information you need to do your job, and to ask questions or report any issues of concern. Be assured that there will be no retaliation or retribution for asking questions or raising good-faith concerns.

Every Mission Partner — including all Board members, officers, managers as well as physicians and other providers — is accountable for adhering to the Code of Conduct. We ask each of you to review the Code, with particular emphasis on the sections that apply directly to your role. Leaders will help to direct their teams to relevant sections. We all must certify that we have reviewed and will abide by the OSF Code of Conduct.

*Thank you for your ongoing support and commitment to the OSF Mission
— to serve persons with the greatest care and love.*

Pax et bonum,



Sister Judith Ann Duvall, O. S. F.

Chairperson
OSF HealthCare Boards



Robert C. Sehring

Chief Executive Officer
OSF HealthCare

The OSF Commitment to Integrity as a Work of the Church

WORK OF THE CATHOLIC CHURCH

OSF is committed to providing care that is consistent with the Gospel and the teaching of the Catholic Church, with compassion and respect for the dignity of each person and their life from conception to natural death.

The Ethical and Religious Directives for Catholic Health Care Services is a foundational and essential document for the identity and ethical conduct of the OSF Mission. The Sisters expect that all OSF Mission Partners understand and follow these Directives for their particular work. The Directives are very significant in the life of OSF and are incorporated as an OSF Policy.



HISTORY OF THE SISTERS OF THE THIRD ORDER OF SAINT FRANCIS

OSF is an apostolate of The Sisters of the Third Order of St. Francis of East Peoria, Illinois.

The Sisters were founded in Peoria in 1877, with Mother M. Frances Krasse as founding Mother Superior and eight other Sisters, who migrated to the United States due to political persecution by Chancellor Bismarck in their native Germany.

As members of the Franciscan Order, the Sisters are inspired by Saint Francis of Assisi and his imitation of Christ in the Gospel.

We call the first generation of Sisters the “Pioneer Sisters,” who in a very poor setting, cared for sick persons and cared for others in their homes. The Sisters ministered with selfless compassion during epidemics and early Sisters died as a result of those who came to them for care.

Today, the Sisters, along with all Mission Partners, are committed to continuing our Pioneer Sisters’ legacy of serving with the greatest care and love in the spirit of Christ.



Guiding Principles

THE OSF CODE OF CONDUCT IS FOUNDED ON COMMITMENT —

- Commitment to serving each other with respect
- Commitment to serving our patients with the greatest care and love
- Commitment to dealing fairly with government regulators, contractors and vendors
- Commitment to fostering stewardship of OSF resources

Key Takeaways



- 1. Treat all patients and fellow Mission Partners with fairness, respect and dignity.**
- 2. Access, use and disclose patient information only for business reasons.**
- 3. Protect OSF proprietary and confidential information.**
- 4. Screen and stabilize all patients who seek emergency care before asking about insurance coverage.**
- 5. Report potential conflicts of interest.**
- 6. Use OSF resources only for business purposes.**
- 7. Practice within your license and keep your license up to date.**
- 8. Practice high quality patient care without asking for or taking anything of value for referrals.**
- 9. Bill only for properly documented medical services that are medically necessary.**
- 10. Report any concerns and suspected misconduct.**

**COMMITMENT TO SERVING
EACH OTHER WITH RESPECT**

OUR COMMITMENT TO CLINICAL AND ORGANIZATIONAL ETHICS

OSF ETHICS SERVICE

We are committed to pursuing all our activities based on our core ethical value of Christian compassion and charity, manifested by compassionate, high quality care and respect for persons.

Each OSF entity has an ethics committee or ethics resource person who provides education, policy review and case consultation. Ethics consultation is available by request in all OSF settings to all OSF Mission Partners, patients or their legal surrogates to address issues arising in clinical, organizational or financial areas.

Mission Partners may choose to consult with their managers, or directly request a consult.

The inherent dignity of the human person must be respected and protected regardless of the nature of the person's health problem or social status. The respect for human dignity extends to all persons who are served by Catholic health care. ERD # 23

- *The Ethical and Religious Directives for Catholic Health Care Services (ERD)* is foundational, which has the normative status of policy in OSF.
- OSF Ethics supports OSF HealthCare professionals and brings awareness of the ethical codes of the professions into consultations and educational programs for the professions.
- OSF Values and ethics are intended to guide each of us in all our everyday relationships with patients, their families and each other.
- We wish to foster both organizational and individual accountability and stewardship in an ethical culture. This means creating a “moral space.” Individuals can, freely and without adverse consequences, raise questions regarding clinical, organizational or financial issues or questions arising regarding the application of the ERD.

For more information and how to request an ethics consult, see the Ethics portal.

OUR COMMITMENT TO SAFETY AND SECURITY

We are committed to keeping our workplace safe for patients, visitors, Mission Partners, non-OSF physicians and other practitioners.

- We participate in required safety training and comply with all laws, regulations and OSHA requirements.
- We maintain a safe work environment and report any hazards (exposed electrical wiring, overloaded circuits or wet floors).
- We report any work-related injury, no matter how minor, to our supervisor and in accordance with appropriate policies.

For more information, contact your local Risk Manager.

We protect the physical security of our patients, visitors, Mission Partners, non-OSF physicians and other practitioners through lighting, security guards, video cameras and other appropriate mechanisms.

Firearms, including concealed firearms, are not permitted in any OSF building or vehicle, unless carried by law enforcement or otherwise authorized individuals. We submit reports as required by the Illinois Firearms Concealed Carry Act.

Mission Partners are required to take annual "Code Silver" training to give them guidance on how to respond to an active shooter situation and provide information and techniques on how to stay safe during an active shooter emergency.



OUR COMMITMENT TO TREATING OTHERS WITH RESPECT

COMMITMENT TO
SERVING EACH OTHER
WITH RESPECT

We are committed to the ERDs, in particular, the directive that “Catholic health care should be marked by a spirit of mutual respect among caregivers.”

- We do not tolerate behavior that undermines a culture of safety and interferes with the effective operation of our organization. Examples of this type of behavior include verbal outbursts, physical threats, quietly exhibiting uncooperative attitudes and condescending language.
- We have a workplace violence prevention program, which among other things, provides training to Mission Partners to equip them with safe and effective tools to deal with a verbally aggressive, assaultive or combative person.
- We report intimidating, threatening, hostile, disruptive or otherwise violent behavior — whether it is the behavior of fellow Mission Partners, patients or visitors.

For more information on workplace safety, contact your local Risk Manager.

For information on how to report retaliation, contact your local Compliance Officer.

*Retaliation against a Mission Partner for reporting a violation of the OSF workplace violence policy is prohibited.

*Mission Partners who are victims of workplace violence are offered post-incident services.



OUR COMMITMENT TO REPORTING COMPLIANCE CONCERNS

We are committed to maintaining open lines of communication for Mission Partners and others to report compliance concerns.

OSF Integrity Line

- All reports are confidential
- You can choose to remain anonymous
(please provide sufficient detail so the report can be investigated)
- Toll free number (800) 547-2822 or online reporting
- Available 24 hours a day/7 days a week

Mission Partners have a duty to report any concerns they may have about activities involving health care fraud or other illegal or improper behavior. Failure to report such concerns is a violation of OSF policy.

Mission Partners should report the following types of issues:

- Health care fraud and abuse
- HIPAA privacy or security violations
- Conflicts of interest
- Theft or misuse of OSF property
- Harassment or discrimination
- Violations of laws or OSF policies
- Improper behavior by coworkers or medical professionals
- Research misconduct

OSF will not tolerate retaliation against an individual for making a report in good faith. Any perceived retaliation should be reported immediately to your supervisor, your Compliance Officer or the OSF Integrity Line.

For more information, contact your local Compliance Officer.

OUR COMMITMENT TO OPEN COMMUNICATION

We are committed to offering many avenues for Mission Partners to express any type of concern or question such as the following —



COMMITMENT TO
SERVING EACH OTHER
WITH RESPECT

- **Immediate Supervisor** — Start here to address most operational issues.
- **Local Compliance Officer** — For questions about conflict of interest, privacy or billing.
- **Ethics** — For questions relating to patient decision-making, e.g., how to be sure the patient’s wishes are followed if family members have opposing views on treatment.
- **Human Resources** — For questions relating to benefits, recruitment or other employment issues.
- **Midas Safety Entry** — This should be used to report conduct that either results in concern for Mission Partner or patient safety or negatively impacts the culture of safety.
- **Compliance Questions** — You can get a quick response to compliance questions relating to billing and coding, documentation requirements, EMTALA and other issues.
- **OSF Integrity Line** — You have a duty to report violations of law or OSF policy. Anonymous reporting is an option.



OSF does not employ or contract with individuals who have been excluded from participating in Medicare, Medicaid or other federal or state health care programs.

- OSF performs an initial screening check to ensure that Mission Partners, business vendors, independent contractors, professional medical staff and volunteers have not been excluded.
- OSF performs a monthly exclusion check thereafter to ensure these parties have not been sanctioned or excluded.

- We maintain our professional license and act within the scope of the license. Prior to the expiration of our license, we renew the license. We update our license with any name change.
- We immediately notify our supervisor of any disciplinary action or sanction taken against our professional license, certification or registration.
- We check the status of our licenses in Michigan and Illinois.

OUR COMMITMENT TO HIRING THOSE QUALIFIED TO WORK

We are committed to ensuring all Mission Partners are screened against the government exclusion lists and have the appropriate licenses and qualifications.

For information on exclusions, contact your local Compliance Officer; for information regarding licensure, contact your local Human Resources representative.

One OSF

At OSF, we believe a culture of respect and inclusion is critical to our OSF Mission. We challenge each Mission Partner to understand that our different views help improve the way we serve patients and one another...with the greatest care and love. We all have different perspectives, but together — we are One OSF.

Recognizing the value each Mission Partner contributes to the OSF Mission, Human Resources focuses on activities that strive to recruit, retain, engage and develop the best people in order to drive a high performance culture.

OUR COMMITMENT TO DIVERSITY

We are committed to being an Equal Opportunity Employer.

COMMITMENT TO
SERVING EACH OTHER
WITH RESPECT

- **We do not discriminate or allow any actions that constitute prohibited harassment of any Mission Partner, patient or visitor.**

Prohibited harassing conduct includes:

- **Negative comments, characterizations, slurs or stereotyping**
 - **Threatening, intimidating or hostile acts**
 - **Belittling or maligning jokes**
 - **Display or circulation in the workplace of written or graphic material that belittles, maligns or shows hostility or aversion towards an individual or a protected class or group**
- **As an Affirmative Action employer, we have a plan in place and take action to improve the hiring and development of qualified applicants and Mission Partners such as individuals in protected classes, veterans and individuals with disabilities.**
 - **We provide reasonable accommodations to qualified individuals with disabilities who can otherwise perform the essential job functions and to Mission Partners affected by pregnancy, unless doing so would create an undue hardship.**

For more information, contact your local Human Resources representative or if a patient is involved, your supervisor.

OUR COMMITMENT TO A DRUG AND TOBACCO-FREE WORKPLACE

We are committed to an alcohol, drug and tobacco-free work environment.

- We do not use any tobacco products or e-cigarettes on OSF property (including land, buildings, parking lots, leased spaces and vehicles).
- To ensure a safe and productive workplace, we do not —
 - Report to work under the influence of prohibited substances
 - Distribute prohibited substances
 - Possess prohibited substances
- To ensure a safe and productive workplace, we notify our supervisor if we believe a medication we are taking may present a safety risk or impair our job performance.

The Employee Assistance Program (EAP) is available to all Mission Partners and their dependents. The EAP provides constructive, confidential and professional consultation and counseling.



Prohibited substances include:

- Prescription drugs (when misused or unauthorized)
- Illegal drugs (including “medical marijuana”)
- Alcohol or otherwise lawful substances abused because of the substance’s intoxicating effects.

For more information, contact your Human Resources representative.

**COMMITMENT TO SERVING OUR PATIENTS
WITH THE GREATEST CARE AND LOVE**

OUR COMMITMENT TO QUALITY CARE AND PATIENT SAFETY

We are committed to providing safe, effective, coordinated systems of care with superior outcomes to those we serve.

- We are committed to implementing a management system with clear accountability for outcomes designed around the concepts of high reliability.
- We foster a culture of team-based care that provides quality, person-centric care within a safe environment, which delivers clinical excellence and zero preventable harm.
- We maintain an effective and comprehensive approach to credentialing and privileging members the medical staff.
- We encourage patients to actively participate in their treatment process, based on their spiritual, cultural and psychosocial values. This leads to the best care outcomes.
- We provide patients access to patient care representatives and ethics consultations to help resolve concerns.

Reporting and Support

Safety is the concern of every Mission Partner. Mission Partners enter adverse events, unsafe conditions and close calls as a Safety Entry in Midas, the event reporting system. This is the first step in understanding the cause of events or issues, which can lead to solutions to prevent unsafe conditions or injury. It helps us achieve our One OSF goal of eliminating all preventable harm.

We offer support for patients, including those who have experienced harm, and their family members and caregivers.

For more information, contact your local Patient Safety Officer or local Risk Manager.



OUR COMMITMENT TO PATIENT RIGHTS

We are committed to treating our patients with respect, dignity and compassion.

- We recognize the God-given inherent dignity of all persons across the natural lifespan: from conception to natural death.
- We comply with applicable federal and state civil rights laws and do not discriminate on the basis of race, color, national origin, religion, sex, gender identity, sexual orientation, age or disability.
- We accept and treat every patient with a caring response to their physical, emotional and spiritual needs.
- We help patients understand and exercise their rights to:
 - privacy
 - freedom from discrimination
 - file a grievance
- We engage with patients, and, when permission is given, their families and others in developing care and treatment options.
- We do not restrict, limit or deny visitation privileges on the basis of race, color, national origin, religion, sex, gender identity, sexual orientation, age or disability.

COMMITMENT TO SERVING
OUR PATIENTS WITH THE
GREATEST CARE AND LOVE

We provide free auxiliary aids and services to our patients with disabilities and whose primary language is not English to ensure effective communication (e.g., qualified sign and spoken language interpreters, translated documents, documents in large print, electronic and other accessible formats).

For more information, contact your local Ethicist or your local Risk Manager.

OUR COMMITMENT TO PATIENT INVOLVEMENT

COMMITMENT TO SERVING
OUR PATIENTS WITH THE
GREATEST CARE AND LOVE

We are committed to involving patients in their care.

- Patients or their legal decision makers have the right to participate in the development and implementation of a plan of care and to make informed decisions.
- Patients have the right to formulate advance directives.

We honor the advance directives according to federal and state laws and regulations.

The Ethical and Religious Directives for Catholic Health Care Services (ERDs) honor advance directives except regarding assisted suicide and euthanasia.

SHARED DECISION MAKING

Informed consent is an ongoing process of communication between the physician or other licensed provider and the patient or legal decision maker that provides adequate information to ensure shared decision making about a patient's care. The process typically results in a signed confirmation of the patient's understanding of the procedure or surgery.

For more information, contact your local Risk Manager or your local Ethicist.

OUR COMMITMENT TO PROFESSIONALISM

We are committed to conducting ourselves professionally at all times and to creating a respectful, collaborative environment for Mission Partners, patients and visitors.

Professionalism is essential to best outcomes and is a critical element of a patient safety culture.

- We respond promptly to calls or requests for information.
- We share information and provide pertinent instruction and focused feedback to promote quality outcomes.
- We do not engage in conduct that interferes with patient care or safety.
- We resolve conflicts in a non-threatening, constructive and private manner.
- We do not use and do not tolerate the use of disparaging, demeaning or abusive language or language that could be construed as harassing, bullying or disruptive to a member of the health care team, patient, family member or caregiver.
- We do not make insensitive comments about a patient's medical condition, race, religion or other characteristics.
- We do not use or threaten unwarranted physical force.
- We do not engage in unwelcome sexual advances or touching.

For more information, contact your local Risk Manager.

OUR COMMITMENT TO COMPLYING WITH THE EMERGENCY MEDICAL TREATMENT AND LABOR ACT (EMTALA)

We are committed to providing the required care to individuals who present to the emergency department.



We do not transfer an individual to another facility before completing a medical screening exam and necessary stabilization.

- We do not ask individuals for payment before providing a medical screening.
- We do not transfer an individual to another facility due to their inability to pay.

- We provide an emergency medical screening examination (MSE) and necessary stabilization to all individuals who come to the emergency department (ED), regardless of ability to pay.
- In an emergency situation or if the individual is in labor, we do not delay the medical screening and necessary stabilizing treatment to seek financial and demographic information.
- We do not admit or discharge individuals with emergency medical conditions based simply on their ability or inability to pay or any other discriminatory factor.
- We do not transfer individuals with emergency medical conditions to other facilities unless requested or if we do not have the capability or capacity to treat the individuals. All transfers are made in compliance with federal, state and facility requirements.

COMMITMENT TO SERVING
OUR PATIENTS WITH THE
GREATEST CARE AND LOVE

Q&A

QUESTION: An individual is sitting in the ED waiting room after registering at the front desk. A Mission Partner is walking nearby and overhears the individual complaining about how long they have been waiting to be seen. Can the Mission Partner suggest that the individual go to OSF PromptCare, where there is a much shorter wait?

ANSWER: No. Once the individual presents to the ED, the individual must be given an MSE and any necessary stabilizing treatment.

QUESTION: An ambulance calls ahead and is told that the ED is on diversion but arrives at the ED door with the individual. Is the ED required to treat the individual?

ANSWER: Yes. Once the individual arrives at the ED, the individual must be given an MSE and any necessary stabilizing treatment.

For more information, contact your local Compliance Officer.

OUR COMMITMENT TO CLINICAL RESEARCH

We are committed to the development of new and better ways to care for our patients through clinical research.

COMMITMENT TO SERVING
OUR PATIENTS WITH THE
GREATEST CARE AND LOVE

- We follow the highest ethical standards in research conducted by our physicians and clinical professionals.
- We obtain informed consent prior to patient participation in clinical research.
- The rights, safety, and welfare of individuals who participate in clinical research are protected by an institutional review board (IRB).

Before conducting research, clinical researchers at OSF are required to undergo a broad spectrum of training. Topics include patient rights, HIPAA privacy rules, responsible conduct of research, how to obtain fully informed consent and good clinical practices.

- The IRB reviews and approves the clinical research before any research activities take place;
- We strictly follow the protocol approved by the IRB; and
- Proposed changes to the research are approved by the IRB prior to being implemented.

- We do not tolerate research misconduct.

For more information, contact the Research Compliance Officer.

Policy Links: [Research, Investigation, and Clinical Trials \(OSF HealthCare Saint Francis Medical Center policy\)](#); [Allegations of Research Misconduct Policy](#), [HIPAA for Research Purposes \(CC-450\)](#), [OSF HealthCare Research Billing Policy](#), [Managing Financial Conflicts of Interest for Public Health Service and National Science Foundation Funded Research \(CC-707\)](#), [Maintenance of a Federalwide Assurance \(FWA\) for Research Subject to U.S. Department of Health and Human Services \(HHS\) Regulations](#), [Conflict of Interest and Disclosure Process for Researchers \(CC-705\)](#)

OUR COMMITMENT TO SAFEGUARDING PROTECTED HEALTH INFORMATION

Protected Health Information (PHI) is any information that can be used to identify an individual and that was created, used or disclosed in the course of providing a health care service. It includes a name, diagnosis, procedure, medical record number or anything else that can identify the individual.

We are committed to maintaining the security and confidentiality of PHI —

- We are familiar with and comply with the OSF HIPAA Privacy and Security policies and procedures.
- We provide patients the OSF Notice of Privacy Practices, which includes a list of privacy contacts.
- We limit our access to and disclosure of patient information to only the minimum amount necessary to do our job.
- We report suspected privacy violations to our supervisor or our local Compliance Officer.

We can access a patient's record to perform our job duties, such as:

- To provide care
- To bill for services provided
- As part of a reimbursement or clinical audit

Otherwise, the use or access of a patient's record is prohibited snooping.

For more information, contact your local Compliance Officer.

SNOOPING

- We do not access our own medical records or those of our family members, even if they have told us it is okay to view them. *We access this information through OSF MyChart.*
- We do not view the records of patients merely out of concern or to satisfy our curiosity, e.g., celebrities, crime or accident victims, neighbors or OSF leaders or co-workers.

SOCIAL MEDIA

- We never post patient information or photographs to a web site, social media page or public forum (or comment on these items), *even if the patient is not identified by name.*
- We take or transmit photographs of patients only as required for patient care.
- With Mission Partner consent, a patient, family member or friend can take a photo of the Mission Partner on the device of the patient, family member or friend.

TEXTING

- When communicating via text message with a health care provider regarding a medical issue, avoid including any PHI such the patient's name, diagnosis or treatment in the text. If the conversation cannot occur in person, the communication must occur via a telephone conversation or secure email.

COMMITMENT TO SERVING
OUR PATIENTS WITH THE
GREATEST CARE AND LOVE

CONFIDENTIALITY

- I can discuss a patient's treatment in front of the patient's friends and family if the patient gives me verbal or written permission. However, I cannot discuss a past medical problem unrelated to the current medical condition.
- I can discuss the medication a patient needs with the patient's health aide who has accompanied the patient to a medical appointment.
- I do not discuss any information about a patient in public places such as elevators, cafeterias or outside of the workplace.
- I do not refer to a patient in ways that could reveal their identity, e.g., saying I took care of a woman who was shot in a burglary.

For more information, contact your local Compliance Officer.

- We log off or lock our computers when we walk away.
- We point our monitors away from others' line of sight and public areas.
- We do not share our passwords.
- We use OSF computers and devices for patient care and OSF business purposes.
- We avoid phishing attacks by being aware of email from unknown senders. We report suspicious emails to the OSF Service Center.
- We never save sensitive data or PHI to an unencrypted laptop or portable storage device. We save the information to a secure network.
- We prevent loss or theft of devices that contain sensitive or confidential data by having them on our person, or by securing them out of sight, such as in the trunk of a vehicle.
- We immediately report a lost or stolen device to the OSF Service Center.

OUR COMMITMENT TO DATA SECURITY

We are committed to ensuring the secure and compliant use of electronic devices.

ENCRYPTION OF OUTBOUND EMAIL

Any emails containing PHI or sensitive information that are sent to someone outside of OSF must be encrypted by placing the word "private" followed by a colon and a space at the beginning of the subject as follows:

To: Patient@medicalinformation.com
Subject: private: test results

Prepare the email as normal, including text and attachments, and the email system will process the email securely.

For more information, contact your local Compliance Officer.

COMMITMENT TO DEALING FAIRLY WITH GOVERNMENT REGULATORS, CONTRACTORS AND VENDORS

OUR COMMITMENT TO COMPLIANCE WITH LAWS AND REGULATIONS

COMMITMENT TO DEALING FAIRLY
WITH GOVERNMENT REGULATORS,
CONTRACTORS, AND VENDORS

We are committed to complying with all applicable federal, state and private payer requirements.

THE OSF COMPLIANCE PROGRAM

The OSF Compliance Program supports the OSF Mission, Vision and Values. The purpose of this program is to provide guidance to all Mission Partners (including Board members, officers, managers, physicians and other providers) in the management and operation of OSF. This program demonstrates the strong OSF commitment to honest and responsible provider and corporate conduct, improves the quality, safety, consistency and efficiency of patient care, and increases the likelihood of identifying and preventing illegal or unethical conduct.

Compliance resources include —

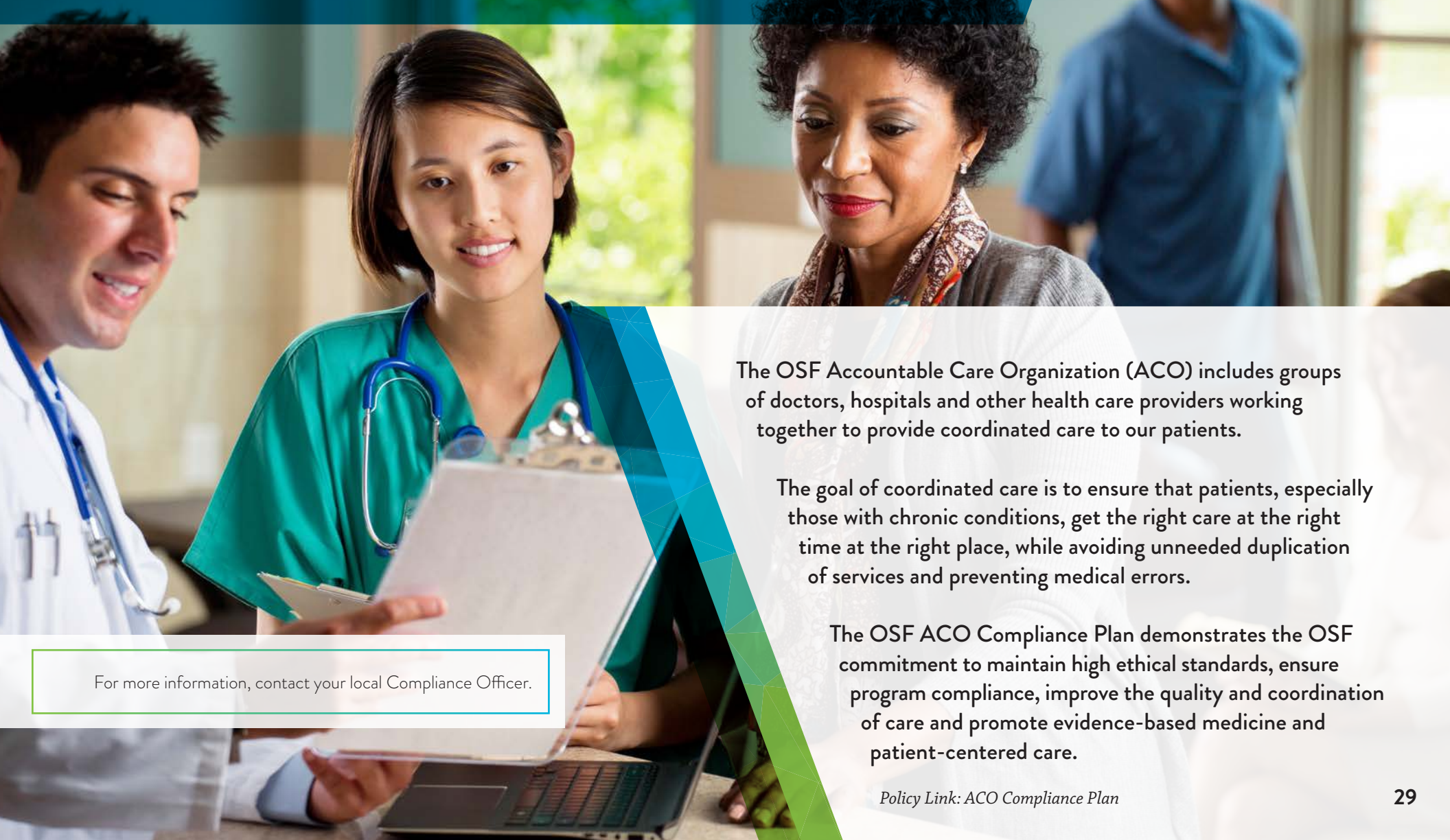
- Annual compliance and privacy training and other compliance education
- Compliance and privacy policies
- Multiple ways to ask questions or report concerns, including the OSF Integrity Line and *Compliance Questions*
- Compliance Officers

For more information, contact your local Compliance Officer.

OUR COMMITMENT TO ACO COMPLIANCE

We are committed to enhancing the lives of our patients through high quality, accessible, coordinated and fiscally responsible care while maintaining compliance with statutory and regulatory requirements applicable to accountable care organizations.

COMMITMENT TO DEALING FAIRLY
WITH GOVERNMENT REGULATORS,
CONTRACTORS, AND VENDORS



The OSF Accountable Care Organization (ACO) includes groups of doctors, hospitals and other health care providers working together to provide coordinated care to our patients.

The goal of coordinated care is to ensure that patients, especially those with chronic conditions, get the right care at the right time at the right place, while avoiding unneeded duplication of services and preventing medical errors.

The OSF ACO Compliance Plan demonstrates the OSF commitment to maintain high ethical standards, ensure program compliance, improve the quality and coordination of care and promote evidence-based medicine and patient-centered care.

Policy Link: [ACO Compliance Plan](#)

For more information, contact your local Compliance Officer.

OUR COMMITMENT TO COMPLETE AND ACCURATE DOCUMENTATION

We are committed to properly documenting all records.

- We are responsible for the integrity and accuracy of all OSF documents to ensure they support our business practices and actions. We do not alter or falsify information on any record or document, such as financial, personnel, insurance or patient records.
- We document all professional services rendered to patients in an accurate and timely manner per regulations and hospital bylaws.

REMEMBER:

Proper documentation is critical because it —

- Records the communication between health care professionals
 - Is the basis for communicating the continuity of patient care
 - Provides evidence of care and treatment rendered
 - Provides evidence that the standard of care was met
 - Provides a basis for reimbursement
 - Is a legal document
- Don't forget to date, time and sign orders and medical record documentation.
 - Don't leave blank spaces in documentation.
 - Don't be inconsistent, it leaves holes and is a problem with the patient's "story."
 - Don't chart assumptions or guesses.
 - Don't chart a symptom the patient complains of, without charting what you did about it.
 - *"If you didn't chart it, it wasn't done."*

For more information, contact your local Compliance Officer.

OUR COMMITMENT TO ACCURATE BILLING AND CODING

*We are committed to submitting bills
that are coded and billed appropriately.*

COMMITMENT TO DEALING FAIRLY
WITH GOVERNMENT REGULATORS,
CONTRACTORS, AND VENDORS

*The Federal False Claims
Act makes it a crime for any
person or organization to
knowingly make or file a false
claim for payment from the
federal government.*

*Illinois and Michigan have
similar state laws.*

- All claims and medical record documentation supporting the claims are complete and accurate and reflect reasonable and necessary services ordered by an appropriately licensed medical professional.
- If a billing error is discovered, appropriate steps are taken to investigate the cause and prevent its recurrence. Any overpayment received is promptly repaid to the appropriate payer. Medicare overpayments are returned within 60 days of identification.
- OSF does not permit retaliation against any Mission Partners who report issues with billing and coding.
- We cooperate with all audits conducted by governmental and external payers. We follow OSF policy regarding complying with search warrants.

For more information, contact your local Compliance Officer.



COMMITMENT TO DEALING FAIRLY
WITH GOVERNMENT REGULATORS,
CONTRACTORS, AND VENDORS

BILLING

Examples of unacceptable billing practices include —

- **BILLING FOR SERVICES:**

- That were not provided
- That were not medically necessary
- That were not properly documented
- That were performed by an improperly supervised or unqualified Mission Partner
- That were performed by a Mission Partner who is excluded from participation in the federal health care programs
- That are unbundled (e.g., billed separately for an E&M service that is included in a global surgical fee)

- **FILING FALSE OR INACCURATE COST REPORTS**

- **SUBMITTING DUPLICATE BILLS**

For more information, contact your local Compliance Officer.

OUR COMMITMENT TO STRENGTHENING OUR RELATIONSHIPS WITH PHYSICIANS WHILE MAINTAINING COMPLIANCE WITH LAWS AND REGULATIONS

COMMITMENT TO DEALING FAIRLY WITH GOVERNMENT REGULATORS, CONTRACTORS, AND VENDORS

We are committed to complying with the Anti-Kickback Statute, the Stark Law and other federal and state laws that govern our financial relationships with physicians who may refer patients to OSF facilities.

- We do not offer, accept, or give bribes, kickbacks or anything of value as an incentive, reward or thank you for patient referrals.
- We consult OSF policies before giving any business courtesies or other tokens of appreciation — such as meals, gifts or entertainment — to any referral source.
- All business arrangements with physicians must be in a written contract and approved by the appropriate officials, including the OSF Legal Department.

Q&A

QUESTION: Can we give a physician tickets to a theater or sporting event if that physician is in a position to make referrals to OSF?

ANSWER: Yes, under limited circumstances. Federal law generally prohibits physicians from making referrals to entities with which they have a financial relationship, unless an exception applies. A financial relationship is created when an entity gives anything of value to a physician, such as a meal or gift. However, there is an exception for items up to a certain dollar amount each year. Check with your Compliance Officer for details.

For more information, contact your local Compliance Officer.

We do not offer or give items of value to Medicare or Medicaid patients if we know or should know that the offer is likely to cause the individual to choose OSF for their health care.

There are limited exceptions to offering gifts or discounts to patients. Check with your Compliance Officer for guidance on:

- Local transportation
- Assistance with paying for medication
- Paying for parking
- Waiving a copayment or deductible
- Blood pressure screening
- Free medical equipment for use at home
- Free home assessment visit

OUR COMMITMENT TO FOLLOWING THE LAWS REGARDING PATIENT INDUCEMENT

We are committed to complying with the rules regarding giving gifts to patients.

COMMITMENT TO DEALING FAIRLY
WITH GOVERNMENT REGULATORS,
CONTRACTORS, AND VENDORS

Mission Partners are encouraged to make donations to charitable Mission projects sponsored by OSF or other non-profit organizations throughout the year, such as Adopt-a-Family, Mission Partner Giving and food drives, even if those programs support patients.

For more information, contact your local Compliance Officer.

OUR COMMITMENT TO THE PROPER USE OF GRANT FUNDS

*We are committed to responsible stewardship
of funds received through federal, state or private grants.*

Before submitting proposals for grants (including proposals for funding cooperative agreements or subaward agreements), Mission Partners must submit the proposal and the proposed budget for review by Grants Administration and the grants financial analyst. This must be done before documents are signed or submitted to collaborators or to sponsors or funders.

- **We review the terms and conditions associated with grant awards prior to the execution of agreements or expenditure of funds.**
- **We comply with all federal, state, and private funder award terms and conditions.**
- **We maintain all grant records, including expenses and time and effort records, in Amplifund.**
- **We cooperate fully with grants compliance, grants administration, and finance and accounting in the review, audit and investigation of grant-funded programs.**

For more information, contact the Grants Compliance Officer.



OUR COMMITMENT TO SAFE HANDLING OF CONTROLLED SUBSTANCES

We are committed to the safe handling of all controlled substances.

- We comply with all laws and regulations that limit the use of prescription drugs and controlled substances and other medical supplies.
- We prescribe controlled substances, such as opioids, in accordance with our license.
- We prohibit the unauthorized access, use or diversion of controlled substances.
- We identify and address the risk of suspect medication entering the pharmaceutical distribution chain.

COMMITMENT TO DEALING FAIRLY
WITH GOVERNMENT REGULATORS,
CONTRACTORS, AND VENDORS

If we determine that a patient or visitor has a controlled substance or illegal drugs, we notify the security office or local law enforcement to take appropriate action, including taking the substance into custody, asking the visitor to leave or searching the patient's room.

If we become aware of inadequate security of drugs or the diversion of drugs, we report the incident immediately to clinical and pharmacy leadership.

For more information, contact your local Compliance Officer.

OUR COMMITMENT TO PROPER RETENTION OF RECORDS

We are committed to handling all records appropriately. Records include paper documents as well as electronic information such as email or computer files on a flash drive and any other medium that contains information about OSF or persons we serve.

- We retain all clinical records, claim documentation and other business documents in accordance with the law and the OSF record retention policy.
- We do not tamper with, alter or falsify any records.
- We destroy records when they reach the end of the retention schedule, in accordance with OSF policy.

COMMITMENT TO DEALING FAIRLY
WITH GOVERNMENT REGULATORS,
CONTRACTORS, AND VENDORS

Retention Schedules

OSF has a record retention schedule that gives the retention period for all business records. For example:

- Patient billing records – 7 years
- Emergency department logs – 5 years
- Peer review files – 25 years from the date the file closed
- X-rays – 12 years
- Contracts and leases – 10 years
- Purchase orders – 3 years
- Personnel records - duration of employment plus 7 years

In some cases, OSF policy may require a longer retention period than federal or state law.

For more information, contact your local Compliance Officer.

OUR COMMITMENT TO ADDRESSING CONFLICTS OF INTEREST

We are committed to performing our duties on behalf of OSF and our patients. We avoid conflicts or the appearance of conflicts between our own interests and the interests of OSF.



We promptly and accurately complete any conflict of interest forms we are asked to submit.

A conflict of interest occurs when a Mission Partner is in a position to make or influence a decision or take an action on behalf of OSF that results in personal gain for the Mission Partner (or immediate family member) as a result of the Mission Partner's business dealings, other financial interests or personal interests.

In the course of our professional life, we may have a range of interests that may compete or conflict. Not every possible conflict of interest requires action.

However, some possible conflicts of interest that may require a management plan to manage, reduce or eliminate the conflict include —

- Doing business with, selecting or purchasing from a vendor when the Mission Partner has a financial interest (ownership or employment) in the vendor.
- Accepting gifts and gratuities from vendors, suppliers or other contractors, patients or visitors.
- Doing work for a company that contracts with, is a supplier of, or competes with OSF.
- Participating on outside boards or other positions with organizations that may conflict with our work at OSF.
- Making use of OSF time, resources or information to benefit our own interests or an outside interest.
- Conducting research or development work for an entity in which we have a personal interest.

COMMITMENT TO DEALING FAIRLY
WITH GOVERNMENT REGULATORS,
CONTRACTORS, AND VENDORS



For more information, contact your local Compliance Officer.

OUR COMMITMENT TO FAIR AND ETHICAL RELATIONSHIPS WITH VENDORS AND CONTRACTORS

We are committed to ensuring our relationships with vendors and contractors is respectful, fair and just.

COMMITMENT TO DEALING FAIRLY WITH GOVERNMENT REGULATORS, CONTRACTORS, AND VENDORS

- We follow all OSF policies when making purchase commitments on behalf of OSF. Supply Chain is solely responsible for making such commitments.
- We ensure vendor relationships and procurement activities are conducted in accordance with the highest standards of accepted business practice and in a manner that does not interfere with the Mission of OSF.
- We ensure that all vendor representatives receive the “vendor guidelines,” which contain the procedures that must be followed by vendors when they visit OSF.

We enter into contracts only as set forth in the Signatory Authority Policy for Binding Contractual Agreements.

For more information, contact your local Compliance Officer or Ministry Ethics resource person.

COMMITMENT TO FOSTERING STEWARDSHIP OF OSF RESOURCES

OUR COMMITMENT TO SERVING OUR COMMUNITIES

We are committed to acting as a responsible not-for-profit organization.

Financial assistance (services provided at reduced cost or at no cost) and medical education activities are just a few of the activities that comprise our OSF community benefit. In exchange for these community benefits, OSF is exempt from paying many federal, state and local taxes. As a tax-exempt organization, we are required to follow a number of laws and regulations. We:

- Avoid compensation arrangements in excess of fair market value or providing goods and services to others at less than fair market value.
- Ensure that all business dealings are reasonable and that we do not engage in excess benefit transactions.
- Submit accurate financial reports to appropriate taxing authorities.
- Avoid any direct or indirect campaigning for or against the election of any candidate for public office or the donation of any OSF funds to political candidates, party organizations or committees.

We conduct community health needs assessments in the communities we serve. Results from these studies are used for strategic decision-making.

For more information, contact your local Compliance Officer.

OUR COMMITMENT TO THE APPROPRIATE USE OF OSF RESOURCES

We are committed to preserving OSF resources, including time, materials, supplies, equipment and information.

- We do not solicit or distribute information on behalf of any organization, business or cause during work time.
- We do not conduct personal business during work hours.
- We use the communication systems and electronic media in a productive manner and for its intended purposes.
- When writing, speaking or acting in our personal capacity, we make clear that we are not acting on behalf of OSF (e.g., we do not inappropriately use OSF logos or make reference to OSF as authorizing our activities).

For more information, contact your local Compliance Officer.

OUR COMMITMENT TO THE APPROPRIATE USE OF CONFIDENTIAL BUSINESS INFORMATION

*We are committed to protecting OSF
confidential business information.*



Confidential Information

- We protect OSF confidential business information:
 - personnel lists and data
 - patient lists and clinical information
 - pricing and cost data
 - passwords
- We keep confidential information about OSF strategy and operations.
- We do not share proprietary information (e.g., terms of insurance contracts) with OSF competitors.
- We do not disclose a vendor's confidential information unless authorized by the vendor or required by law.

For more information, contact your local Compliance Officer.

OUR COMMITMENT TO ETHICAL MARKETING AND COMMUNICATIONS

COMMITMENT TO FOSTERING
STEWARDSHIP OF OSF RESOURCES

We are committed to effectively communicating with each other, patients, prospective patients, the communities we serve and others with respect, honesty and love.

- We present only truthful, informative and non-deceptive information in our materials and communications.
- We present communications that are aligned with OSF Mission, Vision and Values.
- We obtain all necessary approvals from CMS, FDA and other government agencies for applicable communications.
- We use OSF marketing activities to educate the public, provide information to the community and increase awareness of our services.
- We do not use OSF symbols or logos in any communications without approval.
- We refer all media inquiries to OSF Marketing and Communications.

For more information, contact your Marketing & Communications representative.

OUR COMMITMENT TO THE ENVIRONMENT

We are committed to good stewardship of natural resources and to following environmental regulations.

- We comply with all environmental laws and operate each of our facilities with the necessary permits, approvals and controls.
- We follow all requirements for the proper handling of hazardous drugs, pharmaceutical waste and hazardous chemicals.
- We encourage recycling.

For more information, contact your local Compliance Officer.



In 1877, The Sisters of the Third Order of St. Francis began serving their communities with compassion and humility, unafraid of taking on the hardest challenges to provide care to all those who needed it. The same is true today. The rapid change of health care along with emerging technological and scientific advances have only spurred the Sisters to examine how we can leverage these developments for the benefit of our patients. We are committed to encouraging innovations both large and small to reinvent health care to meet the needs of our communities.



OUR COMMITMENT TO INNOVATION

We comply with OSF policies regarding Intellectual Property ownership and conflicts of interest.

We launched OSF Innovation as a means to embrace change and take on the largest health care challenges. We defined four areas that will encompass all our innovation efforts. These areas guide our investments and activities in innovation —

- **Advancing simulation**
- **More for those with less**
- **Radical access to care**
- **Aging in place**

OSF INNOVATION

We define innovation as the process of translating ideas that align with our vision of transforming health care into value for the benefit of the patients and communities we serve.

For more information, contact the Innovation Compliance Officer.

Approval

In accordance with the beliefs, Values, Vision and Christian principles held by the Board of Directors of OSF Healthcare System, this Code of Conduct is approved for all of its service and support activities.

Governing Board Approval: February 19, 2019

Governing Board Final Approval: June 17, 2019

Board Approval: August 26, 2019

