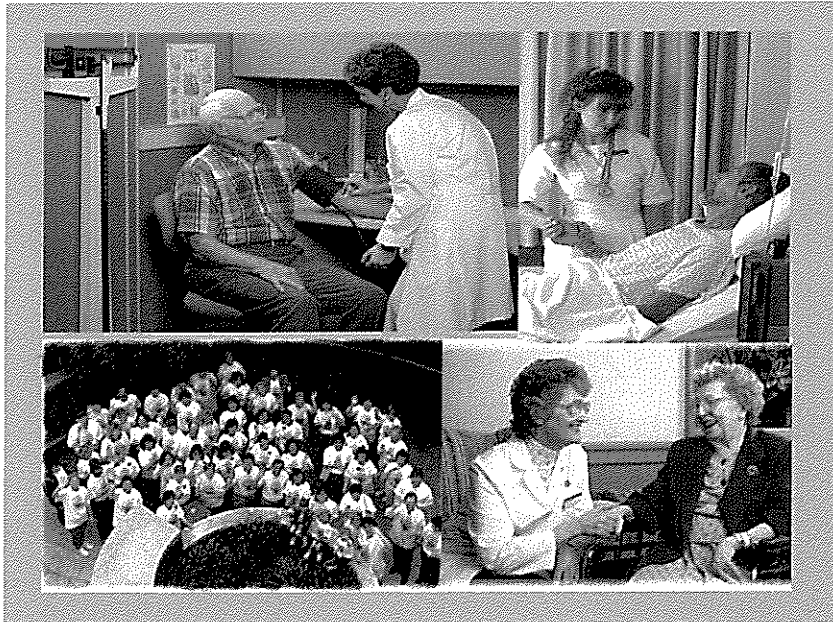




Parkland



Parkland Health & Hospital System

Code of Conduct & Ethics

January 26, 2010

Dear Colleagues:

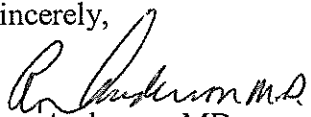
Personal and corporate integrity has been one of Parkland Health & Hospital System's (Parkland) guiding principles since the day our hospital was founded. It enters into everything we do and is a central part of our daily lives. Parkland is committed to providing high-quality services and care in an ethical manner, which is also in full compliance with federal and state laws and regulations.

The Parkland Compliance Program has been developed to meet all of the many laws and regulations that apply throughout Parkland. The Compliance Program is meant to prevent both accidental and intentional violation of those laws and regulations, to detect violations if they occur, and to prevent future noncompliance. The Code of Conduct & Ethics (Code) and compliance policies and procedures support the Compliance Program.

This updated Code is the cornerstone of our Compliance Program and outlines the standards of ethical conduct that all employees should follow. As you read through the Code, much of it will impress you as common sense. However, as we grow and expand our operations in an increasingly regulated and complex environment, it is more important than ever that we have a single definition of corporate integrity and compliance and a common understanding of what we expect of every member of the Parkland team.

The Parkland Board of Managers and senior management staff have pledged their support along with me to uphold the Code and support the Compliance Program. Your commitment is essential to the shared values that unite us as an organization, guide our decisions and actions, and promote the highest quality of care.

Sincerely,


Ron Anderson, MD
President and Chief Executive Officer

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INTRODUCTION

This Code has been adopted by Parkland to provide standards by which everyone, regardless of position, will conduct themselves to protect and promote organization-wide integrity and to enhance Parkland's ability to achieve its organizational mission. This applies to the Parkland Board of Managers, employees, medical staff, volunteers, contractors, vendors, and agents. The Code is also designed to include the operation of the Parkland Community Health Plan, Parkland Foundation, and other affiliates (Affiliates). Failure to comply can result in serious damage to our standing in the community, regulatory action against the organization and individual employees, and employee corrective action up to, and including, immediate termination.

Parkland is dedicated to serving its patients and treating its employees in an ethical, legal, and responsible manner. Furthermore, Parkland is committed to providing all services in full compliance with all applicable laws, regulations and guidelines, as well as its own policies and procedures.

If you have any questions about the Code or any Parkland policies or procedures, ask your manager, the Human Resources staff, or the Compliance Officer. Parkland's managers have a special obligation to be available and responsive to employees when questions arise about adherence to the Code. If you are not satisfied with management's response concerning application of the Code, please raise your concerns to the highest level of management or to the Compliance Officer.

The Code is an integral part of our Compliance Program and sets standards that define the Parkland commitment to compliance. The Code serves as the foundation document of our Program. The Compliance Officer and the Executive Compliance Committee, comprised of Parkland senior leadership, are tasked to manage the Compliance Program in accordance with the Code and the law. We are particularly sensitive to those requirements applicable to federal health care programs and the submission of accurate billings. However, the Parkland standards are not substitutes for your good judgment and the judgment of others within Parkland. They must be used together to maintain our values of honesty and integrity.

The Code is intended to provide standards and guidelines for acceptable behaviors and ensure that we meet our compliance goals in today's highly regulated environment. Acceptable behaviors are in accordance with the Code and guiding principles, while inappropriate behaviors are unsuitable behaviors in the workplace. Intimidating and disruptive behaviors negatively affect and interfere with others in the workplace. These behaviors are not in compliance with Parkland's Code of Conduct and Ethics. Intimidating and disruptive behaviors include overt actions such as verbal outbursts and physical threats, as well as passive activities such as refusing to perform assigned tasks or quietly exhibiting uncooperative attitudes during routine activities. Intimidating and disruptive behaviors are often manifested by health care professionals in positions of power. Such behaviors include reluctance or refusal to answer questions, return phone

calls or pages; condescending language or voice intonation; and impatience with questions. Overt and passive behaviors undermine team effectiveness and can compromise the safety of patients. All intimidating and disruptive behaviors are unprofessional and will not be tolerated.¹

The Code provides general guidance and does not replace Parkland's policies and procedures. In the absence of a specific policy, the Code becomes the policy. If there is a conflict between the Code and a policy, the Code supersedes the policy. The Code is a "living document," which will be updated periodically to respond to changing conditions. Accordingly, Parkland reserves the right to change any or all of these provisions at any time.

This Code applies to *all* members of the Board of Managers, employees, medical staff, volunteers, contractors, vendors, and agents of Parkland and its Affiliates, who are collectively referred to in this document as "Colleagues." Parkland recognizes the different missions and services that each Affiliate provides and the Code is designed to allow flexibility for each Affiliate in developing policies and procedures to achieve the standards and goals set forth in the Code while maintaining each Affiliate's unique mission and services.

The Code is provided only for the management and guidance of Parkland and is not intended to, and does not, create any contractual or other right or benefit, substantive or procedural, enforceable at law or in equity, by any party against Parkland, its Board of Managers, officers, employees, agents, or any other person.

¹ Text extracted from The Joint Commission Sentinel Event Alert, Issue 40 – July 9, 2008

OUR VISION AND MISSION

OUR VISION:

“By our actions, we will define the standards of excellence for public academic health systems.”

OUR MISSION:

“Dedicated to the health and well-being of individuals and communities entrusted to our care.”

OUR GUIDING PRINCIPLES

CIRCLES of Life

Compassion – We will provide service in a spirit of empathy, love, and concern.

Integrity – We will be honest, trustworthy, authentic, humble, and transparent in all of our relationships. We will demonstrate devotion to duty and to the service of others.

Respect – We will treat everyone fairly in recognition of their intrinsic worth.

Collaboration – We will work together with our patients and partners.

Leadership – We will create a servant-led environment.

Excellence – We will provide high standards of service and performance.

Stewardship – We will manage resources responsibly and bring value to patients and taxpayers.

RESPONSIBILITIES UNDER THE CODE

What are the responsibilities of each employee with regard to the Code?

- Understand how the Compliance Program applies to your job and seek assistance and clarification from your supervisor, the Compliance Officer, or other Parkland resources when you have questions about the application of the standards and other Parkland policies to your work.
- Report any conduct that you think may be in violation of the Code.
- Listen and respond to questions, complaints or concerns expressed by patients, family members, visitors, or co-workers.
- Complete all required compliance training.

What are the responsibilities of Parkland managers and other supervisors?

Build and maintain a culture of compliance:

- Personally lead compliance efforts through regular meetings and proactive steps that include compliance reports and regular monitoring of compliance matters.
- Know, understand, and follow the statutes, rules and regulations that govern your area(s) of responsibility.
- Encourage employees to raise conduct and ethical questions and concerns.
- Use employee actions and judgments in promoting and complying with Parkland's Code and other policies as considerations when evaluating and rewarding employees.
- Ensure that you and all subordinates complete all required compliance training.
- Work with the Executive Compliance Committee to ensure that a culture promoting compliance is engrained at Parkland.

Prevent compliance problems:

- Identify compliance risks and propose appropriate policies and procedures to address such risks.
- Provide education and counseling to assist employees to understand the Code, Parkland policies and procedures, as well as applicable law.

Detect compliance problems:

- Implement and maintain appropriate controls to monitor compliance and mechanisms that foster the effective reporting of potential compliance issues.
- Promote an environment that permits employees to raise concerns without fear of retaliation.

Respond to compliance problems:

- Pursue prompt corrective action to address weaknesses in compliance measures.
- Apply appropriate corrective action when necessary.
- Consult with the Parkland Compliance Officer so that compliance issues are promptly and effectively addressed.

What are the responsibilities of Parkland's Board of Managers?

- Lead by example.
- Set the mission for the Parkland Compliance Program and exercise oversight through the Audit and Compliance Committee of the Board of Managers.
- Make decisions that are in the best interest of Parkland and not affected by conflicts of interest.
- Receive appropriate reports from the Compliance Officer concerning the status of the Parkland Compliance Program and ensure the provision of the resources required to maintain its vitality and Parkland's response to identified compliance deficiencies.
- Seek and act upon advice received from management, including Parkland's Chief Executive Officer, Chief Operating Officer, Chief Financial Officer, General Counsel, Compliance Officer, and the Executive Compliance Committee.
- Maintain the confidentiality of all compliance-related information provided, subject to the requirements of applicable law.
- Complete required compliance training.

What are the responsibilities of the medical staff?

- Actively participate in compliance activities as requested by Parkland's administration.
- Assist Parkland in identifying possible compliance issues and in developing possible solutions to address those issues.
- Report any conduct that may be in violation of the Code.
- Cooperate in Parkland investigations concerning potential violations of law, Parkland's Code, the Compliance Program, and applicable policies and procedures.
- Complete required compliance training.

What are the responsibilities of volunteers, contractors, vendors, and agents?

- Read the standards of the Code and have a basic understanding of their application to the services furnished to Parkland.
- Actively participate in compliance activities, such as education and training, as requested by Parkland.
- Understand the various options, including the Parkland Integrity Line (**1-800-351-0093**), that Parkland makes available for raising conduct or ethical concerns and promptly raise such concerns.
- Cooperate in Parkland investigations concerning potential violations of law, the Code, the Compliance Program, as well as applicable policies and procedures.
- Complete required compliance training.

STANDARDS OF CONDUCT AND ETHICS

ACCESS TO CARE

Standard of Conduct: We are committed to providing high quality health care and services to our patients, their families, visitors, and the community.

- We will treat our patients with dignity and respect at all times.
- We will recognize the right of our patients to receive appropriate services provided by competent individuals in an efficient, cost effective, and safe manner.
- We will provide services that are based on current standards of practice.
- We will continually monitor the clinical quality of our services and strive to improve the quality of the services provided.
- We will respect the privacy of our patients and treat all patient information with confidentiality, security and in accordance with all applicable laws, regulations, and professional standards.
- We will address any deficiency or error by reporting it to a supervisor who can review the concern and appropriately follow-up and correct the concern.
- We will support every patient's right to be free from all types of abuse and will not tolerate patient abuse in any form.
- We will apply our admission, treatment, transfer, and discharge policies to all patients based upon identified patient needs, our statutory mission, and appropriate business practices (including guidelines for payment and financial classification).
- We will provide treatment and medical services without discrimination based on race, age, religion, national origin, sex, sexual orientation, or disability.
- We will implement policies and procedures to complete emergency assessments as required for all who request our emergency services.
- We will maintain licensure and credentialing standards to further the provision of clinical services by properly trained and experienced practitioners.

LEGAL AND REGULATORY COMPLIANCE

Standard of Conduct: We will uphold high standards of business and professional ethics and integrity by continuously and vigorously promoting full compliance with applicable laws, regulations, and policies.

- We will conduct our activities in compliance with all applicable laws, regulations, and Parkland policies and procedures.
- We will continuously study our legal obligations and create policies and procedures that facilitate compliance by our colleagues with such legal obligations.
- We will support educational and other training of the Board of Managers, employees, and, as warranted, medical staff, volunteers, contractors, vendors and agents, to promote compliance with our collective legal obligations.
- We will promptly report to management, the Compliance Officer or the Parkland Integrity Line any potential violation of law, regulation, or policy.
- We will not tolerate any retaliation against an employee or medical staff member, who, in good faith, reports a suspected violation.
- We will expect our colleagues to understand their basic legal obligations and job responsibilities.
- We will accept patient referrals and admissions based on the patient's clinical needs, our statutory mission, appropriate business practices (including guidelines for payment and financial classification), and our ability to render the needed services.
- We will not provide inducements, kickbacks, bribes, rebates, or anything else of value to any party (e.g., physicians, etc.) with the intent to influence the referrals of patients.
- We will not provide inducements for patients to access services payable by a government health care program (e.g., Medicare, Medicaid, etc.).
- We will require that all compensation arrangements or other agreements with individuals or organizations that may be possible referral sources (e.g., physicians, etc.) be in current writing and approved through the appropriate process.
- We will recognize the critical role of research and are committed to conducting all research activities in compliance with the highest ethical, moral, and legal standards.

- We will engage in open and fair competition and marketing practices.
- We will not knowingly hire or contract with individuals who have been sanctioned by the Office of Inspector General of the U.S. Department of Health and Human Services ("OIG") or appear on any of the following lists: OIG List of Excluded Individuals/Entities (LEIE), Texas Medicare List of Excluded Providers (TMCLEP), General Services Administration (GSA), the U.S. Treasury Office of Foreign Assets Control (OFAC) or barred from federal procurement programs.
- We will ensure that all employees, medical staff, and applicable third parties who are providers of patient services are properly licensed and trained prior to administering patient care.
- We will comply with the Emergency Medical Treatment and Active Labor Act ("EMTALA") and provide any medical screening examination to all those who seek emergency treatment.
- We will ensure that all marketing, advertising and sales communications are clear, correct, accurate, and compliant with the patient privacy regulations contained in the Health Insurance Portability and Accountability Act of 1996 (HIPAA).
- We will provide information to all employees, agents, and contractors involved in the care of patients with information regarding the Federal and State False Claims Acts.
- We will comply with all patient privacy laws, including HIPAA, to protect the personal health information of our patients

CLINICAL RESEARCH COMPLIANCE

Standard of Conduct: We will undertake scientifically meritorious clinical research, adhere to the ethical principles of respect for persons, beneficence and justice in all research involving human subjects and promote full compliance with applicable laws, regulations and policies.

- We will conduct clinical research that we expect to benefit the community we serve, provided such anticipated benefits are commensurate with any foreseeable risks to our patients.
- We will safeguard the health, welfare, privacy and dignity of our patients who participate in clinical research.
- Our patients who participate in clinical research are entitled to all of the rights and protections afforded to our patients generally.
- We will develop and abide by a Research Participants Protection Plan for all research involving human subjects, regardless of funding source or “exempt” status under the federal regulations governing protection of human subjects in research.
- We will expect our colleagues who engage in clinical research to be fully credentialed and qualified for their roles, to understand and abide by human subjects protection principles and good clinical practices for research and to adhere to applicable laws, regulations and policies.
- We recognize that research subjects are entitled to special protections under the HIPAA Privacy Rule, and will act in strict compliance with those regulations.
- We will not engage in any financial relationship or other activity that may influence or appear to influence our ability to protect human subjects, affect the credibility of our Research Participants Protection Plan or compromise the scientific validity of research results.
- We will investigate and respond promptly to concerns raised by or involving research subjects, and to allegations of non-compliance or unethical conduct by or involving research staff.
- We will design, monitor and update our clinical research billing practices as necessary to avoid and detect false or fraudulent claims.
- We will not knowingly allow any individual who appears on the FDA Debarment List, is disqualified or restricted as a clinical investigator by the FDA or appears on the Public Health Service Administrative Actions List to conduct research at Parkland.

CONFLICTS OF INTEREST

Standard of Conduct: We expect our colleagues to avoid any activities that may involve (or may appear to involve) a conflict of interest.

- We will avoid conflicts of interest between our own private interests and our Parkland duties.
- We will not engage in any financial relationship or other activity that may influence or appear to influence our ability to render objective decisions in the course of our job responsibilities or other services we furnish to Parkland.
- We will maintain and support questions on policies and procedures that make clear when an individual's private interests may inappropriately interfere with Parkland's interests.
- We will articulate expectations of the conduct that must be demonstrated in the performance of services for Parkland and will require that such individuals remain free of conflicts of interest in the performance of their responsibilities and provided services to Parkland.
- We will require Parkland's Board of Managers, employees, medical staff, and volunteers to inform Parkland of personal business ventures and other scenarios that could be perceived as conflicts of interest and will provide for policies and procedures for doing so.
- We will not use any proprietary or non-public information acquired as a result of a relationship with Parkland for personal gain or for the benefit of another business opportunity.
- We will render decisions about the purchase of outside services and goods based on the supplier's ability to best satisfy Parkland's needs and not based on personal relationships.

BILLING AND CODING COMPLIANCE

Standard of Conduct: We are committed to fair and accurate billing that is in accordance with all applicable federal and state laws, regulations, and Parkland policies and procedures.

- We will bill only for services actually provided and documented in the patient's medical records.
- We will promote compliance with laws governing the submission and review of bills for our services and will deal with billing inquiries in an honest and forthright manner.
- We will charge for all health care services provided and will require payment of insurance co-payments or deductibles and not routinely waive these fees.
- We will use systematic methods for analyzing the payments we receive and will reconcile any overpayments in a timely manner after discovery and review.
- We will assign diagnostic, procedural, and billing codes that accurately reflect the services that were provided.
- We will periodically review coding practices and policies, including software edits, to facilitate compliance with all applicable federal, state, and private payer health care program requirements.
- We understand that all claims for services submitted to any insurance program or payer, Medicare, Medicaid, or other federally funded health care programs have to be accurate and correctly identify and document the services ordered and performed.
- We will investigate inaccurate billings and payments to determine whether changes to current protocol or other remedial steps are necessary.
- We will respond to questions and complaints related to a patient's bill in a direct and honest manner.
- We will review cost reports to be filed with the federal health care programs for accuracy, completeness, and compliance with applicable federal and state regulations and Parkland policies and procedures.
- We will implement documentation systems sufficient to create and maintain complete and accurate documentation of services provided.
- We will prohibit the premature destruction or alteration of any document in response to, or in anticipation of, a request for those documents by any government agency or court.

FEDERAL AND STATE FALSE CLAIMS ACTS

Standard of Conduct: We are committed to maintaining fair and accurate billing procedures in accordance with the Federal False Claims Act and State False Claims Act.

Federal False Claims Act

- We will implement policies for all employees (including management), and any contractor or agent of Parkland involved in providing patient care, pertaining to the Federal False Claims Act (FCA), including the administrative remedies for false claims and statements, any State laws pertaining to civil or criminal penalties for false claims and statements, and whistleblower protections under such laws.
- We will not knowingly present or cause to be submitted a false or fraudulent claim to the federal government.
- We will not knowingly make, use, or cause to be made or used, false records or statements to conceal, avoid, or decrease an obligation to pay or transmit money or property to the federal government.
- We understand that damages and penalties for violating the FCA include:
 - Civil penalties of not less than **\$5,500** and not more than **\$11,000** per violation, ***plus***
 - Three times the amount of damages which the federal government sustains because of the violation.
- We understand that *Qui Tam* Provisions (whistleblower rights) of the FCA allows a person to bring an action under the FCA on behalf of the federal government and share in any recovered amount by the federal government.
- We will train all employees on these false claims policies, as well as for preventing, detecting, and reporting fraud, waste and abuse.
- We will not engage in retaliatory conduct against employees exercising their rights under the FCA.

State False Claims Act

- We understand that the Medicaid Fraud Prevention Law (FPL) of the Texas Human Resources Code is substantially similar to the Federal False Claims Act and that the actions that trigger civil and criminal penalties under the Texas FPL generally mirror those of the Federal FCA.

- We will not knowingly make or cause to be made false statements or misrepresentations to permit someone to receive benefits or payments that are unauthorized or are greater than the authorized benefit or payment.
- We will not knowingly conceal or withhold information to permit a person to receive a benefit or payment that is unauthorized or is greater than that authorized.
- We will not knowingly apply for and receive a benefit or payment on behalf of another person and use any part of it for something other than the benefit of the person on whose behalf it was received.
- We will not knowingly make, cause to be made, induce, or seek to induce the making of false statements or misrepresentations of material fact concerning:
 - the condition of operations of a facility so that the facility can qualify for Medicaid certification; or
 - information required by federal law, state law, rule, regulation, or provider agreement pertaining to the Medicaid program.
- We will not, except as authorized under the Medicaid program, knowingly pay, charge, solicit, accept, or receive, in addition to any amount paid under the Medicaid program, a gift, money, donation, or other consideration as a condition to the provision or continued provision of a service or product if the cost of the service or product is paid for by the Medicaid program.
- We will not, if a license is required, knowingly submit or cause to be submitted a claim for a product provided or service rendered by a person who is not licensed to provide the product or perform the service or is not licensed in the manner claimed.
- We will not knowingly make a claim for (a) a service or product that has not been approved or accepted by a treating physician or health care practitioner, (b) a service or product that is substantially inadequate or inappropriate when compared to generally recognized standards within the particular discipline or within the health care industry, or (c) a product that has been adulterated, debased, mislabeled, or that is otherwise inappropriate.
- We will not knowingly fail to indicate the type of license and the identification number of the licensed health care provider who actually provided the service on a claim.
- We will not knowingly enter into an agreement, combination, or conspiracy to defraud the state by obtaining or aiding another person in obtaining an unauthorized payment or benefit from the Medicaid program or fiscal agent.
- We will not knowingly obstruct an authorized investigation of an alleged unlawful act under the FPL.

- We will not knowingly make, use, or cause the making or use of a false record or statement to conceal, avoid, or decrease an obligation to pay or transmit money or property to the state.
- We understand that damages and penalties for violating the FPL include:
 - Payback to the state with interest,
 - Civil penalties of (a) not less than **\$5,000** or more than **\$15,000** per violation if the unlawful act results in injury to an elderly person, a disabled person, or a person younger than 18 years of age, or (b) not less than **\$5,000** or more than **\$10,000** for each violation that does not result in injury to a person as described above, *plus*
 - Two times the amount of the payment or the value of benefit received.
- We will not engage in retaliatory conduct against employees exercising their rights under the FPL.

RELATIONSHIPS WITH PHYSICIANS AND OTHER PROVIDERS

Standard of Conduct: We will monitor our business dealings to structure relationships in ways that satisfy the needs of the community.

- We will maintain relationships with physicians and other referral sources based only on the needs of our community and consistent with the furtherance of our mission.
- We will treat referral sources fairly and consistently and will not provide remuneration that could be considered payment for referrals.
- We will implement policies and procedures that require fair market value determinations for services rendered by referral sources and for services rendered by Parkland.
- We will implement procedures to require all agreements with referral sources to be reduced to writing and reviewed and approved as appropriate under law and Parkland's policies and procedures.
- We will train the appropriate personnel on the laws and regulations governing the referral of patients, other legal restrictions on Parkland business transactions, and the penalties for violations of such laws.

WORKPLACE ENVIRONMENT

Standard of Conduct: We recognize that a diverse workforce enriches the life experience of all employees and our community and will promote diversity.

- We will treat our employees, patients, volunteers and each other with respect and will engage in human relations practices that promote personal and professional advancement.
- We will provide equal employment opportunities to employees and applicants for employment without regard to race, color, religion, sex, national origin, marital status, political belief, age (40 or over), veteran status, sexual orientation or disability in accordance with applicable law.
- We will implement policies and procedures that promote compliance with laws governing nondiscrimination in personnel actions, including recruiting, hiring, training, performance appraisals, transfer, workforce reduction, termination, compensation, benefits, reclassification, counseling, discipline, and promotion of employees.
- We will promote diversity with respect to individuals with disabilities and will make reasonable accommodations to any individual, as required by law.
- We are committed to providing a safe work environment and will implement and monitor policies and procedures for workplace safety compliant with federal and state safety laws, regulations, and workplace safety directives.
- We will strive to provide an environment that is free from violence. Unauthorized weapons of any kind are strictly prohibited.
- We will comply with and abide by all applicable environmental, health, and safety laws and regulations whether established by management, federal, state or local laws, or accrediting organizations.
- We will take all reasonable precautions and follow all rules and regulations to maintain a safe environment for our customers, their families, employees, and visitors.
- We will immediately advise our supervisor if, as a result of work, we are injured or contract an occupational illness.
- We will immediately self-disclose any and all felony and misdemeanor convictions (excluding Class C misdemeanor traffic law violations), including those for which we received probation.

- We will promptly report any accidents involving injury to an employee, physician, or other service provider, applicable third party or visitor through the event reporting process.
- We will alert the appropriate departments and personnel if unsafe conditions or practices are observed in the work environment.
- We will adhere to all regulations and procedures for disposing of medical waste and hazardous material.
- We will promptly report all spills or accidents involving medical waste or hazardous materials to a supervisor and take immediate action to help prevent harm and/or further damage.
- We will provide all employees with health and safety training in an effort to reduce risks.
- We will follow all laws and policies regarding the manufacture, sale, possession, distribution, or use of illegal drugs or alcohol, which are strictly prohibited at Parkland. Reporting to work while under the influence of drugs or alcohol will not be tolerated.
- We will safely store, secure, and count all drugs and pharmaceuticals. Missing or diverted drugs will be promptly reported to the appropriate supervisor.

PROTECTION AND USE OF INFORMATION, PROPERTY, AND ASSETS

Standard of Conduct: We are committed to protecting Parkland information and other property against loss, theft, destruction, and misuse.

- We will correctly use and care for all property and equipment entrusted to us.
- We will appropriately maintain inventory and keep all supplies secure.
- We will comply with software licensing agreements.
- We will prohibit the making of unauthorized copies of computer software or the use of personal software on Parkland computer equipment.
- We will appropriately use electronic communications systems to communicate information and understand that the use of technology to send offensive, discriminatory, or harassing messages is prohibited.
- We will protect confidential Parkland information.
- We will maintain all information, whether medical, financial or business, in accordance with all applicable laws, regulations, and organizational policies.
- We will not falsify or inappropriately alter information on any record or document.
- We will establish retention periods and protocols for business, financial, and patient records in our system.
- We will promote the accurate, detailed, and complete documentation of all business, financial, and patient transactions.
- We will control and monitor access to Parkland's communications systems, electronic mail, Internet access and voicemail to ensure that such systems are accessed appropriately and used in accordance with Parkland's policies and procedures.
- We will protect the privacy and security of patient medical, billing, and claims information, and other protected health information through sufficient and reasonable physical, technical, and administrative measures to prevent unauthorized access to or use or disclosure of patient information.
- We will provide access to medical, billing, and claims information for our patients and their legal representatives as required by law.

- We will not knowingly communicate or transfer any information or documents to any unauthorized persons.
- We will safeguard the personal and human resources information of our employees and information retained within the human resources system as required by law.

CULTURE OF SAFETY

Standard of Conduct: We are committed to promoting a culture of safety and assuring quality for the health and safety of our patients and their families, visitors, employees, physicians, and other service providers.

- We will take all reasonable precautions and follow all procedures, rules, and regulations to maintain a safe environment for our patients and their families.
- We will encourage patients and their families to report their observations and complaints of unsafe conditions to a Supervisor and/ or a Patient Advocate.
- We will listen to our patients, families, and visitors to understand any concerns or complaints and will involve patients in the decision- making process about their care.
- We will quickly and efficiently respond to patient's questions, concerns and needs.
- We will respond to patients and/or families who are involved in or witness intimidating and/or disruptive behaviors and will thank them for sharing their concerns.
- We will hold all colleagues accountable for modeling desirable behaviors which include, but are not limited to :
 - maintaining high levels of professionalism
 - respecting all patients, family members, staff and visitors
 - working as a team member
 - communicating openly and honestly
 - maintaining patient confidentiality
 - reporting patient safety concerns promptly
- We will have zero tolerance for unacceptable or disruptive behavior in the work environment as defined in the Employee Behavior Expectations procedure (HR 6000-300) and in the Medical Staff Unprofessional and Disruptive Conduct procedure.
- We will investigate reports of unacceptable or disruptive behavior and if a report of such behavior is substantiated, will move to the Corrective Action procedure (HR 6000-700) or the Medical Staff Unprofessional and Disruptive Conduct procedure.
- We will utilize the Patient Safety Network (PSN) when reporting incidents of unacceptable or disruptive behavior or patient complaints and/or concerns.

REPORTING VIOLATIONS AND RAISING CONCERNS WITHOUT FEAR OF RETALIATION

Parkland is committed to providing all colleagues with a means of raising questions and concerns and reporting any conduct that is suspected to be in violation of this Code. Everyone is encouraged to raise compliance concerns and ask questions and has an affirmative duty to report a violation.

Colleagues are encouraged to follow a **4-step reporting process** that includes:

1. Discuss the question or concern with your direct supervisor
2. Contact a member of the management team, if you are not comfortable with talking to your supervisor or feel you did not receive an adequate response.
3. Call the Compliance Officer directly at (214) 590-2156, or,
4. Call the Parkland Integrity Line at **1-800-351-0093** or file an Integrity Report online at www.parklandintegrityline.ethicspoint.com.

The following list, while not exhaustive, describes the type of concerns and questions that you should raise with your supervisor, a member of the management team, the Compliance Officer, or through the Parkland Integrity Line:

- Improper billing or coding of patient accounts.
- The submission of false, inaccurate, or questionable claims to Medicare, Medicaid, or any other payer.
- Falsification of documentation.
- Destruction of evidence during an investigation or related to actual or anticipated litigation.
- The provision or acceptance of payments, discounts, or gifts in exchange for referrals of patients.
- Suspected or actual breaches of patient privacy and security or identity theft.
- Situations that could raise conflict of interest concerns.
- Retaliation for reporting compliance concerns.

Human Resources issues should be reported utilizing the steps below:

1. Discuss the question or concern with your direct supervisor.
2. Contact a member of the management team, if you are not comfortable talking to your supervisor or feel you did not receive an adequate response.
3. Contact your HR Business Partner, the Employment Experience Department, or any member of the Human Resources Division.

The following list, while not exhaustive, describes Human Resources related issues that you should bring forward to the appropriate individual as indicated above. It is Parkland's commitment to support an environment of trust and ensure all Human Resources issues are thoroughly investigated and addressed appropriately. Examples of Human Resources related issues include:

- Discrimination

- Sexual harassment
- Retaliation for reporting Human Resources concerns.
- Unfair administration of Human Resources Procedures

No retaliation will be taken against you for reporting a perceived issue, problem, concern or violation (by others) to management, Human Resources, the Compliance Office, the Parkland Integrity Line, or the Joint Commission “in good faith.” “In good faith” means an employee actually believes that the information reported is true. We value and respect the dignity of the individual; therefore, you have the right to be treated fairly and with respect, and Parkland will ensure that you are treated that way.

WHEN IN DOUBT

Warning Signs and a Quick Quiz

There may be times when you are unsure whether an activity or a situation is unethical or illegal. If you are not sure, pursue it until you are confident that it is either resolved or that the right person in Parkland knows the facts and has taken action. A delay on your part could be serious for you, for others, and for Parkland.

There are words and phrases that raise “red flags” about potential problems and should send a warning signal to you. The following are examples of such words and phrases:

“Well, maybe just this once.”

“Everyone does it.”

“No one will ever know.”

“Shred that document -- no problem.”

“No one will get hurt.”

If you hear comments like these or you begin to say things like this, then the following “quick quiz” could be helpful as a guide for what needs to be done next:

“Does this break a law, regulation, policy, or our Code?”

“How will I feel about myself afterwards?”

“What would my family, friends, our physicians, or patients think?”

“How would this look if it were in the newspaper tomorrow?”

“Am I being fair and honest?”

If you are not comfortable with any of your answers to the above questions, or if you are still not sure whether an activity is wrong, contact your supervisor, another trusted manager of Parkland, or the Compliance Officer. The 4-step communication and reporting process outlined in the previous section should be a helpful guide.

CONTACT INFORMATION

Compliance Officer: (214) 590-2156
(direct)

Compliance Office: (214) 590-1171

Parkland Integrity Line (Hotline): **1 (800) 351-0093**
or www.parklandintegrityline.ethicspoint.com.
(24 hours a day/7 days a week)

Office of Quality Monitoring
The Joint Commission
One Renaissance Boulevard
Oakbrook Terrace, IL 60181
800-994-6610

Personal Commitment and Certification

I acknowledge and certify that I have received and read the Parkland Code of Conduct & Ethics (Code), understand my obligations to comply with the Code, and have an affirmative duty to report compliance violations.

I agree to comply with the Code.

Employees: I understand that compliance with this Code is a condition of my continued employment. I further understand that violation of the Code may result in corrective action, up to and including termination.

Initials: _____

Board of Managers: I understand that compliance with this Code is essential to my service on the Board of Managers of the Dallas County Hospital District.

Initials: _____

Medical Staff: I understand that compliance with this Code is a condition to my ability to practice my profession at Parkland. I further understand that violation of the Code may result in corrective action as provided in the Bylaws of the Medical Staff.

Initials: _____

Agents/Volunteers/Contractors: I understand that compliance with this Code is a condition of my continued ability to furnish services to Parkland. I further understand that violation of the Code may result in a termination by Parkland of any relationship I have with Parkland.

Initials: _____

Please sign here: _____

Date: _____

Please print your name: _____

Dept. _____