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## Code of Conduct



## TABLE OF CONTENTS

A Message from Amy B. Mansue	Page 4
About Us	Page 5
Introduction	Page 6
Our Commitment to Integrity and Just Culture	Page 8
• A Collective Commitment	
• The Responsibility of Management	
• Doing the Right Thing	
• Non-Retribution Policy	
Our Commitment to Patients	Page 10
• Patients' Bill of Rights	
• Emergency Medical Treatment and Active Labor Act (EMTALA)	
Standards of Conduct	Page 15
Integrity in Our Business Relationships	Page 16
• Billing, Coding and Documentation	
• Business Confidentiality	
• Conflicts of Interest	
• Contracting, Procurement and Purchasing	
• The Deficit Reduction Act	
• Entertainment, Gifts and Favors	
• Fair Competition and Antitrust Laws	
• Financial Integrity	
• Government Investigations	
• Recruiting and Compensation	
• Referrals of Care and Service	
• The False Claims Act	
Integrity in Our Community Relationships	Page 26
• Environmental Stewardship	
• Financial Reporting	
• Fraud, Waste and Abuse	
• Fundraising, Contributions and Solicitations	
• Marketing	
• Political Contributions and Policy Advocacy	

- Record Keeping, Record Retention and Record Destruction
- Tax-exempt and Nonprofit Status
- Truthfulness and Cooperation

Integrity and Just Culture in Our Care and Service Relationships                          Page 30

- Information Security
- Patient Privacy
- Professional Eligibility, Debarment and Exclusion
- Quality of Care

Integrity in Our Workplace Relationships                                  Page 37

- Accountability and Discipline
- Alcohol, Firearms and Controlled Substances
- Compliance Education
- Diversity and Inclusion
- Organizational Policies and Procedures
- Organizational Resources and Equipment
- Personal Communications
- Protection of Personnel – Non-Retribution
- Reporting Code of Conduct Violations and Other Compliance Concerns
- Responsibilities of Management
- Harassment and Disruptive Behavior

Conclusion    Page 41

<sup>1</sup> Throughout the Code of Conduct the terms “Inspira or Inspira Health” shall refer to the entire health care system comprising Inspira Health.

## A Message from Amy B. Mansue

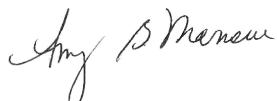
A Message to all Employees, Health Care Providers, Officers, Board Members, Volunteers, Students, and Vendors:

I am pleased to introduce this Code of Conduct. This document was created to guide you in dealing with situations you may encounter in your work. As we continue our journey to becoming a High Reliability Organization, it takes the commitment of every employee to continually elevate safety, quality and reliability for our patients and staff. The Code of Conduct provides guidance that will help ensure that we conduct our business in an ethical and legal manner, provide the highest level of safe and reliable care, and that we treat each other with dignity and respect. The Code of Conduct emphasizes the shared common values that must guide our actions. These include quality, partnership, empowerment, integrity, stewardship, compassion and excellence. The Code of Conduct, along with your immediate supervisor, Safety Coach, the Human Resources Department, the Office of Corporate Compliance, and others serve as a resource to help resolve any questions or concerns you may have about appropriate conduct in the workplace. Your adherence to its spirit, as well as its specific provisions, is absolutely critical to our future.

I ask you to read the Code of Conduct completely. If any section of the Code of Conduct is unclear to you, or if you have any questions or concerns about a situation you are facing, there are several ways to seek assistance. First, we hope you feel comfortable discussing your question or concern with your immediate supervisor. If, however, your question or concern cannot be resolved at this level, or if you are reporting a suspected violation of the Code of Conduct or any law or regulation, you have a responsibility to report the matter immediately to the Corporate Compliance Officer. You may also report your concerns by calling the Compliance Hotline at 1-888-413-4313. Throughout this document, we will provide contact information to assist you in your reporting requirements. You have my personal assurance there will be no retribution for asking questions, raising concerns or reporting possible improper conduct in good faith.

Our commitment to the ideals reflected in our mission, vision and values complements the standards presented in this Code of Conduct. Thank you for upholding them as we work together to improve the lives of all we serve.

Sincerely,



Amy B. Mansue, President and Chief Executive Officer  
Inspira Health

# **ABOUT US**

## **Mission**

To provide a safe and compassionate experience that improves the health and well-being of our community by placing the safety of our patients and support of our employees at the center of all we do.

## **Vision**

Inspira Health inspires and empowers healthier communities by creating the highest quality and most desirable patient experience in the region.

## **Inspiring Medicine**

Inspira Health is a charitable nonprofit health care organization and a regional leader in physician training. The system, which traces its roots to 1899, comprises three hospitals, two comprehensive cancer centers, several multi-specialty health centers and more than 150 access points. These include urgent care; outpatient imaging and rehabilitation; sleep medicine labs; cardiac testing facilities; digestive health and wound care centers; home care and hospice; and more than 35 primary and specialty physician practices in Gloucester, Cumberland, Salem, Camden and Atlantic counties.

Together with our medical staff and other health care providers, we provide evidence-based care to help each patient achieve the best possible outcome. Our clinical and support staffs are focused on providing quality care in a safe environment for every patient. And we understand that to provide excellent care to our patients, we must also be sensitive to the needs of their families. The love and support of family can comfort and strengthen patients, while aiding the healing process.

In support of our mission to improve the lives of all we serve, the leadership and staff of Inspira Health are dedicated to clinical and service excellence. However, as a leading regional health network, we are committed to doing more than just that. We believe our organization must become a source of inspiration, encouraging everyone to lead healthier lives. This can only be achieved by working together with our communities; by bringing vital services to the towns and neighborhoods we serve; and partnering with like-minded organizations to create a culture throughout our region that fosters good health for everyone.

## INTRODUCTION

The Code of Conduct defines Inspira's expectation of ethical conduct and compliance for all employees, as well as, those who do business with, or on behalf of, Inspira including Trustees, Medical Staff, vendors and volunteers. As a High Reliability Organization (HRO), you will see that many of the elements of the Code of Conduct and tools that we will ask you to use are the same that we have learned in our HRO journey of Leading Reliably to ZERO Harm.

Inspira Employees, Health Care Providers, Officers, Board Members, Volunteers, Students, and Vendors must use all tools available to them in support of our Just Culture. Inspira fosters a Culture of Safety across our network. We must speak up for safety, by paying attention to detail, by self-checking using STAR (Stop-Think-Act-Review), by providing Peer Checks when appropriate, welcoming Peer Checks and thanking those that provide a Peer Check. We must communicate clearly, by completing 3-Way Repeat-Backs and Read-Backs and asking Clarifying Questions. We must apply a questioning attitude by Validating and Verifying when we have that “gut” feeling something is not right. We must know why and comply with continuous use and reference use protocols. At Inspira we identify our safety absolutes as our Red Rules. We must use our Red Rules, the Use of Two Patient Identifiers (Name and Date of Birth) and Performance of a “Time Out” in procedural areas and stop the line if safe conditions are not met. We must speak up for safety by ARCC’ing (Ask a Question, Request a Change, Voice a Concern, and Chain of Command) up concerns. Our compliance program and our HRO journey of Leading Reliably to ZERO Harm is to have tools and guidance that helps us carry out daily activities safely within appropriate ethical and legal standards in alignment with our Just Culture. **It is required that we abide by this Code of Conduct** and that you report any concerns or raise questions about what to do or how to act in a difficult situation. Inspira’s Just Culture supports you by maintaining a policy of non-retribution by protecting anyone who reports an issue or raises a concern in good faith.

Speaking up for safety using our ARCC tool is simple.

Start by using the language “I have a concern” – At Inspira, we have all been trained that when we hear the word CONCERN, this is serious and we must stop the line to listen and focus on the concern brought forward.

Speak Up for Safety using ARCC can help us assert a concern in a non-threatening way when our efforts to check and coach a coworker are being met with resistance.

Using the “lightest touch possible”:

- ASK a question
- Request a Change
- Communicate a CONCERN (the use of the word CONCERN should trigger an immediate response that requires a check for safety).

And if you have no success and still believe there is a safety risk, then escalate your concern through the:

- Chain of Command

You should talk to your immediate supervisor, Human Resources Business Partner, the Office of Corporate Compliance or the office of Inspira's General Counsel.

When it comes to matters of safety, we need to eliminate the Power Distance or fear of questioning superiors. All staff members are advocates and any staff member may respectfully speak up for safety to any other staff member without fear.

We ask that you try and alleviate at this level first but if there is Power Distance that prevents you from raising your concern, or you don't feel like you can safely do this than you should talk to another member of management.

You may always escalate your concern to the Office of Corporate Compliance or call the Corporate Compliance Hotline at 1-888-413-4313, or file a report on-line at

<https://app.mycompliancereport.com/report.aspx?cid=ihn>

No matter how concerns are reported whether anonymously, by name, in person, or through the Compliance Hotline, employees can rest assured that confidentiality will be maintained to the extent possible. All reports will be investigated, and all investigations will be conducted in a manner that reflects Inspira's values, its respect for the rights of all parties, and applicable law. We are committed to closing the loop with you so you will understand the resolution of your concern

The principles found in the Code of Conduct represent Inspira's continued commitment to excellence with integrity, which all members of Inspira are expected to adopt. Since the success of our organization depends on this dedication, adherence to the Code of Conduct is a condition of employment with Inspira.

## **OUR COMMITMENT TO INTEGRITY AND JUST CULTURE**

“Integrity” is defined as an “adherence to moral and ethical principles,” and is consistent with our values of don’t harm me, heal me, and be nice to me.

### **A Collective Commitment**

The message of compliance and the Code of Conduct applies equally to all including our Board and senior management.

### **The Responsibility of Management**

Management has the fundamental responsibility for ensuring high ethical standards and actions by all members and affiliates of Inspira. Management is measured on their support in implementing the Code of Conduct, their adherence to its principles and an assurance that their employees within their areas of responsibility receive compliance training and reinforce our Just Culture. Inspira recognizes that at times, despite the efforts of every employee and physician to deliver the best work possible, errors or unsafe acts may occur in the workplace. When such events occur, Inspira believes in a consistent, fair, and systematic approach to understanding these events in a manner that balances a non-punitive learning environment with the equally important need to hold individuals accountable for their actions. A fair and Just Culture recognizes that even competent staff make mistakes and that individuals should not be blamed for honest mistakes, or errors caused by system or organizational issues. We recognize the work we do is complex, rooted in systems of care, and we all depend on each other and other departments to provide care to our patients. It promotes an atmosphere where staff report and discuss errors or “near misses” without the fear of reprisal, through a fair-minded assessment of events which in turn promotes system modifications and behavior changes to prevent future errors. All events will be assessed objectively and analyzed using a systematic approach as outlined in the Performance Management Decision Guide (PMDG). It is important to note that the outcome of the error is never used in determining a fair and just outcome.

### **Doing the Right Thing**

We must always remember that while the law holds us to a minimum standard of behavior, we take pride at Inspira in holding ourselves to the highest standards of safe, professional, compassionate patient centered care and respect for all in our community. Therefore, it is important to consider the moral principles that govern our conduct and led us to a career in patient care. Ethical decisions allow each of us to make the future better in an environment which presents ethical conflicts every day. The Code helps us recognize and address such concerns.

### **Non-Retribution Policy**

At Inspira our Just Culture supports the Non-Retribution Policy. Inspira employees,

management, physicians, vendors, contractors, volunteers, students, patients, visitors and others are encouraged to report any concerns regarding actual or potential non-compliance with federal and state laws, the Inspira Code of Conduct, and internal policies and procedures. Inspira employees furthermore have a **mandatory responsibility** to report concerns in a timely manner. Inspira prohibits retribution or retaliation against anyone who in good faith reports such concerns. For more information on the Non-Retribution policy, please refer to the following link:

<https://inspirahealthnetwork.policytech.com/dotNet/documents/?docid=32096>

# OUR COMMITMENT TO PATIENTS

## Patients' Bill of Rights

Our patients have certain rights when receiving treatment. These rights were approved by the New Jersey State Department of Health and are required under law. In addition to these rights, Inspira adheres to several additional rights included below. A complete copy of the law is available at nurse's stations, registration areas, administration offices, and patient relations offices. Each patient receives a summary copy of the hospital patient's rights in their Welcome Patient Information Packet and a copy of the Patient Bill of Rights is posted in certain public places throughout the Hospitals. The Patient Bill of Rights is addressed in Inspira policy ADM.044. Here is a link to the policy:

<https://inspirahealthnetwork.policytech.com/dotNet/documents/?docid=26508>

Inspira Patients have the right to:

- Receive the care and health services that Inspira is required to provide by law.
- Be treated with courtesy, consideration, and respect for the patient's dignity and individuality.
- Be free from verbal or physical abuse.
- Be free from foul or inappropriate language.
- Freedom from physical and mental abuse.
- Freedom from restraints unless authorized by a physician for a limited period of time to protect the safety of the patient or the safety of others.
- Receive an understandable explanation from their physician of the patient's complete medical condition, recommended treatment, expected results, risks involved, and reasonable medical alternatives. If a physician believes that some of this information would be detrimental to the patient or beyond the patient's ability to understand, the explanation must be given to the patient's next of kin or guardian and documented in the medical record.
- Give informed written consent prior to the start of specified, non-emergency medical procedures or treatment. If the patient is not able to give informed written consent, Inspira will seek consent from the patient's next of kin or guardian or representative appointed through an advance directive or as otherwise authorized by law.

- Refuse medication and treatment to the extent permitted by law after possible consequences of this decision have been explained clearly to the patient.
- Expect reasonable continuity of care.
- Appropriate assessment, management, and treatment of pain.
- Expect that pain management will be provided by healthcare professionals who are committed to pain prevention and who respond quickly to a patient's report of pain.
- Be included in experimental research only if the patient gives informed, written consent.
- Contract directly with a New Jersey licensed registered professional nurse of the patient's choosing for private professional nursing care (private duty nursing) during the patient's hospitalization,
- Be informed of the names and functions of all physicians and healthcare professionals providing direct care. These individuals will identify themselves by introduction or by wearing a name tag.
- Receive as soon as possible, the services of a translator or interpreter if the patient needs help in communicating with healthcare personnel.
- Be informed of the names and functions of any outside healthcare and educational institutions involved in the patient's treatment. Patients have the right to refuse to allow their participation.
- Receive, upon request, Inspira's written policies and procedures regarding lifesaving methods and the use or withdrawal of life support mechanisms.
- Be advised, in writing, of Inspira's rules regarding the conduct of patients and visitors.
- Have prompt access to the information in the patient's medical record with proper authorization unless the patient's physician determines that such access would harm the patient's health and explains this in the medical record. If this occurs, the patient's next of kin or guardian shall have a right to see the record.
- Obtain a copy of the patient's medical record within 30 days after a written authorization/request. If the patient's physician has determined that access to the record would harm the patient's health, the medical record will be made available to the patient's legally authorized representative or another physician of the patient's choosing.

- Receive a copy of Inspira's payment rates. The patient has the right to receive an itemized bill, and to appeal any charges and to receive an explanation of procedures to follow in making such an appeal.
- Be informed by Inspira if part or the entire hospital bill will not be covered by insurance. Inspira is required to help patient's obtain public assistance and private healthcare benefits to which they may be entitled including information regarding indigency and eligibility for charity care.
- Receive information and assistance from the attending physician and other healthcare providers if the patient needs to arrange for continuing healthcare after discharge.
- Receive sufficient time before discharge to arrange for continuing healthcare needs.
- Be informed by Inspira about any appeal process which the patient is entitled to by law if the patient disagrees with Inspira's discharge plans.
- Be transferred to another facility only when the patient or their family has made the request, or instances where Inspira is unable to provide the patient with the care they need.
- Receive advance explanation from a physician of the reasons for the transfer and possible alternatives, confirmation of acceptance from the receiving facility, and a description of possible risks of transfer except in a life-threatening situation where immediate transfer is necessary.
- Have access to storage space in the patient's room for private use including a system to safeguard the patient's personal property.
- Have physical privacy during medical treatment and personal hygiene function unless the patient needs assistance.
- Expect that the patient's privacy will be respected when hospital personnel need to discuss the patient's care and condition.
- Confidential treatment of patient information. Information in the patient's record that includes the patient's identity will not be released to anyone outside Inspira without the patient's approval unless the disclosure is required to obtain payment, healthcare services, or is required by law.
- Treatment and medical services without discrimination based on race, age, ethnicity, religion, culture, language, gender, sexual orientation, gender identity or expression, physical or mental disability, diagnosis,

socioeconomic status or source of payment.

- Retain and exercise the patient's constitutional, civil, and legal rights.
- The right to determine who may visit the patient during their stay at Inspira. Visitation privileges cannot be denied or abridged on the basis of race, creed, color, age, nationality, marital status, sexual orientation, gender identity or expression, disability, or source of lawful income. Inspira may restrict patient access to visitors based on reasonable clinical needs.
- Have full and equal visitation privileges consistent with the patient's wishes.
- The right to withdraw consent to allow visitation at any time.
- The right to present questions or grievances to a designated hospital staff member and to receive a response in a reasonable period of time.

### **Emergency Medical Treatment and Active Labor Act (EMTALA)**

As part of Inspira's mission to fulfill its ethical and legal obligations, we are committed to providing appropriate emergency medical care to all patients regardless of their ability to pay. This includes:

- An appropriate medical screening examination for any individual who comes to a hospital emergency room.
- Providing necessary stabilizing treatment to an individual with an emergency medical condition (including a woman in labor) anywhere on the hospital campus.
- Providing for an appropriate transfer of the individual when Inspira does not have the capability or capacity to provide treatment necessary to stabilize the emergency medical condition.
- Not delaying an examination in order to inquire about the individual's insurance status or payment method.
- Obtaining or attempting to obtain written and informed refusal of examination, treatment, or an appropriate transfer when an individual refuses examination, treatment or transfer.
- Not taking adverse action against a physician or qualified medical personnel who refuses to transfer an individual with an emergency medical condition or against an employee who reports a violation of EMTALA.
- Accepting appropriate transfers of individuals with emergency medical

conditions if Inspira has the specialized capabilities not available in the transferring hospital and has the capacity to treat those individuals.

Clarifying questions regarding EMTALA should be directed to your manager, the office of Inspira's General Counsel, Inspira Patient Relations, Hospital Administration or the Office of Corporate Compliance.

## **STANDARDS OF CONDUCT**

The Standards of Conduct are divided into four parts:

1. Integrity in Our Business Relationships
2. Integrity in Our Community Relationships
3. Integrity in Our Care and Service Relationships
4. Integrity in Our Workplace Relationships

## **INTEGRITY IN OUR BUSINESS RELATIONSHIPS**

As a High Reliability Organization, Inspira is recognized as a leading provider of health care. As a leader, Inspira relies on, and must continually demonstrate, that we conduct our business relationships with personal and professional integrity. We must follow the legal, professional, personal and ethical standards that are described in the following business functions.

### **BILLING, CODING AND DOCUMENTATION**

Inspira is committed to full compliance with all state and federal laws and third-party payer requirements that govern billing, coding, documenting and submitting claims for payment. These laws and requirements are intended to prevent health care fraud and false claims. Claims for the services we provide or bill for must be supported by documentation that is:

- Accurate
- Timely
- Legible
- Accessible

#### **Billing and Coding**

Inspira relies on our coding professionals to translate the documentation in a patient's medical record into a format that allows for appropriate billing and reimbursement. Inspira will only seek reimbursement for services that were actually rendered, properly documented, coded and billed correctly.

Our coding teams can only assign and report codes that are properly supported by provider documentation. No one may make coding assumptions when language is not sufficiently clear, and no one may include or exclude a code because of the effect on payment or coverage.

When a claim is submitted for payment by Inspira, we must certify that the claim is accurate and complete. Therefore, it is the responsibility of all individuals involved with the coding and billing process to understand the claim creation process and the rules associated with correct submission. We may only submit claims for services that are reasonable and necessary for the patient's care. As a representative of Inspira you are required to speak up for safety and ARCC up any concern you have; and if you have no success and still believe there is a safety risk, then escalate your concern through the chain of command.

There are various Inspira policies related to billing and coding specific to sites of service and specific situations. If you are involved in the billing and coding process, please review these policies in PolicyTech.

#### **Documentation**

The medical record documents a patient's treatment at Inspira. In addition to serving as the basis for reimbursement of services provided, the medical record is a legal document and crucial to

memorializing the chronology and outcome of a patient's care. Inspira has an electronic medical record (EMR) to allow for improved collection and tracking of data related to patient care. The EMR requires manual input of complete and accurate documentation from our clinical and medical staff.

As we are all human, and humans make errors, we must pay attention to detail and take a STAR (Stop-Think-Act-Review) moment when inputting in the EMR.

Stop-Think:

- Did you document the need for the services provided to the patient, and why the patient needs those particular services?
- Did you document the complete status of the patient's signs, symptoms, and medical history?
- Were the services provided to a patient clearly documented in the medical record?

Act:

- Follow Inspira's Verbal Orders policy. The link to the policy is:

<https://inspirahealthnetwork.policytech.com/dotNet/documents/?docid=26516>

Review:

- Were the orders and progress notes dated, timed, and authenticated by the originator?

Clarifying questions regarding Billing, Coding and Documentation should be directed to your manager or the Office of Corporate Compliance.

## BUSINESS CONFIDENTIALITY

Health care is extremely competitive; and our success depends on the unique nature of our programs, systems and information. Inspira's proprietary and business information must be kept confidential at all times.

This means that you must never share confidential business information with anyone – including business associates at other organizations, friends, and family members. Internally, you should limit the information you share with people who work here at Inspira on a “need to know” basis.

You **must** apply a questioning attitude, if your internal smoke alarm goes off and your “gut” tells you this isn’t right. Validate and Verify if the Inspira representative “needs to know” this information to safely complete their job.

Paying attention to detail ensures that business-sensitive information and protected health information in the form of records, mailings and other documentation, both paper and electronic, are both accurate and complete.

If you are unsure if you should be sharing information related to Inspira with others, either within or outside the organization, take a STAR moment and ask your immediate supervisor or contact the Corporate Compliance Officer. It is very important that we all protect the confidentiality of vital business information.

#### ***What kinds of business information must be kept confidential?***

Proprietary and confidential information includes, but is not limited to, non-public information related to:

- Pricing and costs
- Acquisitions, divestitures and other strategic relationships
- Business and marketing plans
- Clinical services plans
- Staffing level plans
- Employee and customer lists
- Financial information
- Research and quality data
- Product/program planning
- Privileged information, such as attorney-client communications or peer review information, and
- Many other things that are important to the organization and our strategic or competitive position

Clarifying questions regarding Business Confidentiality should be directed to your immediate supervisor or the Office of Corporate Compliance.

## **CONFLICTS OF INTEREST**

Conflicts of interest may occur if personal activities or interests would influence your ability to make decisions that are in the best interests of Inspira. As a representative of Inspira, you have a duty to act solely in the best interests of the organization. This means that you must not engage in activities that result in gain or profit for yourself or others at the expense of the organization, or that interfere with your work duties or business judgment.

The test for whether there is a conflict of interest is an objective test; that is, whether a conflict exists “in the eyes of a reasonable person,” not whether you think there might be a conflict. Inspira maintains a **Conflicts of Interest Policy** that provides detailed information regarding conflicts of interest. The link to this policy is:

<https://inspirahealthnetwork.policytech.com/dotNet/documents/?docid=32826>

<https://inspirahealthnetwork.policytech.com/dotNet/documents/?docid=32826> Inspira is legally obligated to protect its property and ensure its facilities and equipment are used appropriately. Resources such as materials, equipment, time and space should be used only for your work, unless your immediate supervisor has specifically made an exception according to company policy.

If you feel you may have a potential conflict of interest, you must speak up for safety and report it, in writing, immediately to the office of General Counsel.

Clarifying questions regarding Conflicts of Interest should be directed to your immediate supervisor or the Office of Corporate Compliance.

***“What are common potential conflicts of interest that should be reported?”***

These include, but are not limited to, a financial interest in a vendor who does business with Inspira; receiving a gift from an entity or individual that could be viewed as trying to influence a decision on behalf of Inspira; membership on the governing body of a company that does business with Inspira; a department leader hiring a family member into the department.

***“How do you know when a potential conflict of interest may exist?”***

It's important to look at the facts and circumstances in order to determine if a conflict of interest exists. For example, a friendship with someone who works for a competitor is fine, but you should avoid talking about Inspira with them so that you don't inadvertently disclose confidential information or put yourself or the organization in an inappropriate, or even illegal, situation. That's why it's important to let the office of Inspira's General Counsel know if you are involved in any activities that may even remotely raise the possibility of a conflict of interest. Even the appearance of a conflict may have negative effects on both you and the organization.

## **CONTRACTING, PROCUREMENT AND PURCHASING**

Our goal is to buy quality goods and services at the best price through an objective selection process. This process includes several protections:

We make purchasing decisions based on objective criteria such as quality, price, technical expertise, timely delivery, service standards and adequate supply.

- Contractors and vendors must comply with relevant Inspira policies.
- We do not do business with individuals and organizations that have been excluded from or sanctioned under federal or state health care programs or who have other restrictions on their eligibility to work with government contractors. Therefore, the Inspira vendor selection process includes an inquiry as to whether the applicant has

been excluded from participation in federal health care programs or disqualified or sanctioned as a government contractor. The Office of Corporate Compliance routinely monitors the list of excluded individuals to assure that we do not inadvertently contract with or employ someone who has been excluded from participation in a government program. If you learn that someone with whom we do business is excluded, please ARCC this up to the Corporate Compliance Officer immediately.

- People who make purchasing and contracting decisions on behalf of Inspira should pay specific attention to the Conflicts of Interest Policy. Anyone involved in such a decision must act with integrity in negotiating and awarding contracts in all purchasing and service transactions. These decisions must be based on objective criteria and not on personal relationships or friendships. If necessary, you may have to recuse yourself from a purchasing or contracting decision if there is the appearance of a potential conflict. Always apply a questioning attitude.

Employees are expected to read and comply with Inspira's Contracts Policy. Clarifying questions regarding the implementation and adherence to the procedure should be directed to the office of Inspira's General Counsel or the Office of Corporate Compliance. A link to the policy is below:

<https://inspirahealthnetwork.policytech.com/dotNet/documents/?docid=32343>

## **THE DEFICIT REDUCTION ACT**

The prevention and enforcement of healthcare fraud, waste, and abuse is governed by Federal Government Section 6032 of the Federal Deficit Reduction Act of 2005 (DRA). This law requires healthcare organizations to notify their employees and affiliates of important Federal and State anti-fraud regulations.

DRA is part of Inspira's annual mandatory education for all employees as well as a component of Inspira's new employee orientation. Concepts that are part of the DRA are also addressed in this Code of Conduct or other Inspira policies including, The Federal False Claims Act including whistleblower protection, the New Jersey False Claims Act, the New Jersey Insurance Fraud Prevention Act, the New Jersey Medical Assistance and Health Services Act, and the New Jersey Conscientious Employee Prevention Act.

Anyone affiliated with Inspira is required to comply with the provisions of the DRA and all government anti-fraud laws and regulations. Clarifying questions regarding the Federal Deficit Reduction Act of 2005 (DRA) or any other government anti-fraud laws and regulations should be directed to your immediate supervisor or the Office of Corporate Compliance.

## **ENTERTAINMENT, GIFTS AND FAVORS**

At Inspira we strive to provide a WOW experience to each and every person that enters one of our facilities. Occasionally, we might be offered gifts or other tokens of appreciation from vendors,

patients, their families, customers, competitors and others. In many industries, entertaining customers and exchanging gifts are customary practices, but in health care, we are in a unique position of trust. We are also governed by unique laws that prohibit or discourage gifts and gratuities. Most importantly, our patients and co-workers need to know that the work we do is not inappropriately influenced by gifts from the people with whom we do business.

The receipt of gifts, gratuities or the sponsoring of entertainment from those seeking to influence business decisions of Inspira should be politely declined. You should recognize that even if you believe that the acceptance of such a gift, gratuity, or participation in entertainment will not influence your decision, the person making the gesture may have the perception that the action will have such influence.

Courtesies such as meals, beverages, and/or other entertainment should be scrutinized. When meals or refreshments are provided as part of a business meeting or part of an agenda at a third party, accredited professional meeting where continuing education credit is awarded, and where it is normal business courtesy to accept the meal or refreshment, it is permissible. Where entertainment is provided, as an adjunct to a business meeting or accredited professional gathering as described above, and the value of the entertainment is consistent with Inspira policy, participation is permissible. These exceptions do not permit any gifts or other benefits that are understood to be offered or provided as an inducement to refer business or as a reward for such referrals.

Inspira has a **Business Gifts and Courtesies Policy** to help you answer questions about entertainment, gifts and other items you may be considering. The Policy contains guidelines for third party interactions. The link to the policy is:

<https://inspirahealthnetwork.policytech.com/dotNet/documents/?docid=32933>

Clarifying questions regarding Entertainment and Gifts should be directed to your immediate supervisor or the Office of Corporate Compliance.

***Example of a business gift or courtesy scenario: A software vendor invites an employee to an educational forum where training will be provided on the vendor's product. The vendor offers to cover travel, lodging, and registration fees associated with the conference. Is this appropriate?***

Inspira's **Business Gifts and Courtesies Policy** states that on occasion, a business associate will extend training and educational opportunities that include travel and overnight lodging at no cost to associates or to Inspira. Similarly, there are some circumstances where there is an invitation to an event at a vendor's expense to receive information about new products or services. Prior to accepting any such invitation, approval to attend these opportunities will need to be obtained by the senior leader of the department.

***"Is it ok to accept a gift from a grateful patient?"***

Non-cash gifts such as flowers, candy, cookies, etc., can be accepted if offered as a recognized gesture of appreciation or during the holiday season if the value of the gift is under \$50.00. Frequent gifts from a specific individual or entity should be reported to the Corporate Compliance department.

## **FAIR COMPETITION AND ANTITRUST LAWS**

We conduct all activities in full compliance with all applicable federal, and state laws, regulations and professional standards. We provide services that are safe and we conduct our marketing efforts with truth, accuracy, and fairness. All proprietary information is kept confidential and maintained in a secure manner.

At Inspira we believe in a safe and healthy competitive marketplace. Antitrust laws are designed to encourage fair trade and competition in the marketplace. We will not behave in a way that is anti-competitive or violates antitrust laws.

All Inspira employees must comply with applicable antitrust laws and other similar laws which regulate competition. Examples of conduct prohibited by such laws include (a) agreements to fix prices, bid rigging, or collusion with competitors (including price sharing); (b) boycotts, certain exclusive dealings, and price discrimination agreements; and (c) unfair trade practices, including bribery, deception, intimidation and similar unfair practices.

Whenever we are considering entering into an arrangement with another organization or person in the same line of business that we are in whether it is a health plan, hospital, care delivery or clinical research arrangement it is important to take a STAR moment and consult with the Legal Department to make sure that the arrangement complies with applicable antitrust laws. Inspira employees are expected to seek advice from the office of Inspira's General Counsel when confronted with business decisions involving a risk of violation of antitrust laws or other similar laws.

## **FINANCIAL INTEGRITY**

We require honest and accurate reporting of financial information to make responsible business decisions. All financial information is recorded in accordance with generally accepted accounting principles and established finance procedures and internal controls.

## **GOVERNMENT INVESTIGATIONS**

Government investigators may arrive unannounced at Inspira to seek interviews and/or documentation. If this occurs, immediately notify the office of Inspira's General Counsel. Under no circumstances, can records be released without appropriate legal documentation such as a subpoena or search warrant and only after the request has been reviewed and approved by the office of General Counsel.

If a government official requests an interview, please notify the office of General Counsel immediately. You are under no obligation to speak to an investigator. For more information, please refer to Inspira's Government Investigations policy, ADM.170. The link to the policy can be found here:

<https://inspirahealthnetwork.policytech.com/dotNet/documents/?docid=30835>

## **RECRUITING AND COMPENSATION**

There are special laws that relate to recruiting and compensating our employees, especially physicians and executives. These laws include the Anti-kickback, Stark and tax laws discussed in other places in this Code of Conduct. Our recruiting and compensation activities must adhere to Inspira's requirements, which include:

- Compensation and recruiting packages must be at fair market value
- Compensation and recruiting packages must not include incentives to induce patient referrals
- Executive compensation must be established in accordance with board-approved processes
- The office of General Counsel should review any unique recruitment or compensation packages

## **REFERRALS OF CARE AND SERVICE**

There are several laws that regulate patient and member referrals to other providers, facilities, suppliers and plans. These laws, some of which are known as the Anti-kickback, Stark and Patient Freedom of Choice laws, are complicated, so it is important to consult with the office of Inspira's

General Counsel or the Office of Corporate Compliance if you are considering an arrangement that might impact patient referral patterns.

***What are inappropriate “arrangements that might impact referrals?”***

- A hospital providing free or discounted space or equipment to a physician to encourage the physician to admit patients to its facility.
- A supplier giving gifts to employees as a “thank you” for increasing their supply orders.

### **The False Claims Act**

Inspira is committed to honest and ethical interactions with all health care payers. Federal health care programs such as Medicare, Medicaid, and TRICARE are the largest source of reimbursement to the organization, so it is critical that the bills we submit to government programs are accurate and complete. The False Claims Act (FCA) is the principal statute that the Federal Government relies upon to enforce health care fraud matters. The FCA prohibits providers from “knowingly” submitting false claims or fraudulent claims to the government. The FCA further requires that providers disclose and return overpayments within sixty days after the date the overpayment was identified.

Because of the complex nature of billing and coding healthcare claims it is important all individuals involved with the process know why and comply with the coding and billing requirements related to their job.

If you are concerned that claims are not being submitted appropriately or are concerned that an identified overpayment received from a Federal health care program has not been disclosed or refunded you are required to speak up for safety and ARCC it up to your immediate supervisor, or the Office of Corporate Compliance.

Please review Inspira’s Fraud, Waste, and Abuse policy. A link to the policy can be found here:

<https://inspirahealthnetwork.policytech.com/dotNet/documents/?docid=31966>

***What does “knowingly” mean?”***

The FCA defines the term ‘knowingly’ to mean any person who has actual knowledge of the falsity of the claim, acts in a deliberate ignorance of the truth, or acts in reckless disregard of the truth or falsity of the claim.

***What exactly is a false claim?***

A “false claim” can be defined in several ways, but in basic terms: If a provider or plan is asking for – or planning to keep – payment from the government that it knows it is not entitled to, then it most likely is a false claim. There are many examples of situations that can lead to a “false claim,” but some of the most commonly reported are:

- Making duplicate claims for services
- Up-coding to more complex procedures
- Billing for services that were not provided
- Billing for services that were not medically necessary
- Billing for services of providers who were not present
- Inappropriate bundling and unbundling of claims

## **INTEGRITY IN OUR COMMUNITY RELATIONSHIPS**

As a High Reliability Organization, creating successful relationships throughout the community is a vital part of Inspira's success. We act with integrity in our dealings with regulators, public officials and candidates, contributors and the community. The following standards are critical to upholding our community commitments.

### **ENVIRONMENTAL STEWARDSHIP**

Inspira is committed to safe and responsible disposal of waste products. Inspira complies with all laws governing the handling of waste and hazardous materials—including storage, treatment, incineration, disposal and discharge and other environmental safety requirements. We expect employees and providers to take a STAR moment and follow all safety and industrial hygiene, waste management and environmental guidelines adopted by the organization.

### **FINANCIAL REPORTING**

Inspira is committed to fair, accurate, complete and timely financial and other data reporting. Our statements about significant financial and other data reporting matters must be made fully and truthfully. We must not be misleading to others receiving or using that information. Inspira's leadership must maintain a system of internal controls designed to provide reasonable assurance that the organization meets financial and other data reporting obligations and objectives.

### **FRAUD, WASTE AND ABUSE**

Inspira is committed to preventing, detecting and correcting fraud, waste and abuse related to all health care transactions, regardless of whether those transactions are paid by a commercial health plan, an employer, or the government. Every member of the Inspira is responsible for stopping the line and ARCC'ing up suspected health care fraud to any of the following resources:

- Your immediate supervisor
- The Corporate Compliance Officer at 856-507-7857
- The Compliance Hotline at 1-888-413-4313
- Email [compliance@ihn.org](mailto:compliance@ihn.org)
- Online <https://app.mycompliancereport.com/report.aspx?cid=ihn>

### **FUNDRAISING, CONTRIBUTIONS AND SOLICITATIONS**

Charitable fundraising events and solicitations sponsored by Inspira or an Inspira department must comply with all federal, state and local laws as well as the organization's reporting, record-keeping and registration procedures.

## MARKETING

Inspira uses advertising and marketing to inform the communities we service about healthcare services available to them and the safe and reliable quality care we provide. Advertising and marketing are also used to educate the community of current healthcare trends and other information to promote wellness.

Marketing activities are highly regulated. Most notably, the Anti-kickback Statute Section 1128B(b) of the Social Security Act makes it a felony to offer, pay, solicit, or receive renumeration as an inducement to generate business payable by the Medicare or Medicaid programs. For more information on this topic, please refer to Inspira policy ADM.158 Direct to Consumer Marketing. The link can be found here:

<https://inspirahealthnetwork.policytech.com/dotNet/documents/?docid=26462>

Additionally, the Health Insurance Portability and Accountability Act (HIPAA) places further restrictions on marketing activities. Please refer to Inspira policy CC.13 Uses and Disclosures of Protected Health Information for Marketing, for more information. The link can be found here:

<https://inspirahealthnetwork.policytech.com/dotNet/documents/?docid=32828>

## POLITICAL CONTRIBUTIONS AND POLICY ADVOCACY

The tax-exempt organizations of Inspira:

- Are prohibited from making political contributions; and
- Must observe restrictions on its public policy advocacy activities.

Tax-exempt organizations are prohibited from making direct or indirect contributions to candidates running for federal, state or local office, or to political parties, organizations, or committees, except as permitted by federal or state law. Individuals in a position to influence the activities of Inspira must not personally benefit from our non-profit activities. As a result, it is inappropriate to provide gifts or subsidize travel or lodging for government or public officials. However, it is permissible to provide meals or refreshments as part of a business meeting, or as a normal business courtesy. If you have any questions about providing meals or refreshments, please consult your immediate supervisor, or contact the Office of Corporate Compliance.

As private individuals we can make personal contributions, but we may not contribute to candidates, political parties or political action committees on behalf of the tax-exempt affiliates of Inspira, except as permitted by law. Clarifying questions regarding Political Contributions, Policy Advocacy and Lobbying Activity's should be directed to your immediate supervisor, office of Corporate Compliance or the office of Inspira's General Counsel.

Please review Inspira policy, ADM.166 "Political Activity." A link to the policy can be found here:

<https://inspirahealthnetwork.policytech.com/dotNet/documents/?docid=27885>

## **RECORD KEEPING, RECORD RETENTION AND RECORD DESTRUCTION**

You must be thorough, timely and truthful with medical and business records, whether paper or electronic. Records must be kept for the appropriate retention period, consistent with Inspira policy and state law, and then destroyed in the appropriate manner.

Records are kept across Inspira within a variety of care settings, so it is not possible to list all the applicable rules. However, you must learn the rules that apply to any records with which you are required to work as part of your job responsibilities. It is extremely important to take a STAR moment and remember that:

- False facts and false records may be illegal and are not permissible.
- Records are only provided to people who have a legal "need to know" or those who are authorized by a patient or someone else who has the authority to provide such an authorization.
- Records are maintained for as long as legally required.
- Patient confidentiality must be preserved.
- Records are disposed of only in accordance with established policies and procedures.
- Alteration of records is strictly prohibited.

Business documents and records are retained in accordance with federal and state law and Inspira policies and procedures. Business documents include paper documents such as letters and memos, claims, enrollment applications, computer-based information such as email or computer files and any other medium that contains information about the organization or its business activities. It is important to retain and destroy records appropriately according to the applicable policy. You must not tamper with records, nor remove or destroy them prior to the specified date.

There are numerous Inspira policies that address the use of records and record retention. If you need clarification related to your specific job function you should discuss your concern with your immediate supervisor, review the policies in Inspira's policy database accessible on the Inspira intranet page, or contact the Office of Corporate Compliance or the office of Inspira's General Counsel.

## **TAX-EXEMPT AND NONPROFIT STATUS**

Inspira and many of our affiliates are not-for-profit organizations that have been granted tax exempt status by the Internal Revenue Service (IRS) based upon our charitable healthcare mission. To maintain this status, the IRS requires Inspira to provide annually certain information on finance assistance and community benefit. Maintaining our tax-exempt status is critical to fulfilling our mission. We must not engage in activities that inappropriately benefit private organizations or individuals including employees.

The laws that govern our tax-exempt and nonprofit status are very complicated – and very important. If you have any clarifying questions, or have identified a potential concern regarding whether Inspira is putting its assets and other resources to proper use, you must speak up for safety

and ARCC up your concerns with your immediate supervisor. You can also raise these concerns to the office of Inspira's General Counsel, the Office of Corporate Compliance, the Compliance Hotline (1-888-413-4313) or make a report on-line at

<https://app.mycompliancereport.com/report.aspx?cid=ihn>

Inspira has several taxable entities. Inspira employees must timely and accurately report payments to appropriate taxing authorities and file all tax and information returns in a manner consistent with applicable laws for such taxable entities. You must speak up for safety if you identify inappropriate reporting, you must speak up for safety by ARCC'ing up your concerns to your immediate supervisor, Corporate Compliance and the office of Inspira's General Counsel.

## TRUTHFULNESS AND COOPERATION

Health care is a highly regulated industry, so Inspira is subject to regular and extensive oversight by government agencies, law enforcement authorities and external auditors. You must be truthful and accurate whenever submitting a regulatory filing or certification, or responding to an external inquiry on behalf of Inspira. You must consult with the office of Inspira's General Counsel or the Office of Corporate Compliance for assistance with the submission. Likewise, you are required to be truthful and cooperative whenever we are involved in an inquiry or investigation led by someone in the organization, such as the office of Inspira's General Counsel or the Office of Corporate Compliance.

## **INTEGRITY AND JUST CULTURE IN OUR CARE AND SERVICE RELATIONSHIPS**

As a High Reliability Organization, the relationships we build with our patients and the community are the foundation of everything we do at Inspira: no one depends on our integrity and just culture more than they do. Each of the following standards are vital to ensuring that we earn and maintain their trust every day.

### **INFORMATION SECURITY**

In addition to protecting our patients' privacy, we are also required to keep their information secure. This means that not only must Inspira maintain confidentiality; we must also ensure the integrity and availability of patient information. We do this by complying with Information Security policies and procedures and by reporting any suspected information security concerns.

***"Information Security" seems like such a big and scary issue. Can I really do anything to stop hackers and others who want to steal information?***

By taking a STAR moment and following these precautions, each of us can reduce threats to information security:

1. STOP: Don't share your computer passwords with anyone – ever.
2. Lock your computer workstation and/or use password-protected screensavers that automatically kick in when you are away from your workstation.
3. Secure personal computing devices, such as laptops, hand-held devices, and cell phones.
4. Do not open email attachments that are suspicious or come from unknown senders.  
Take a STAR moment, with STOP being the most important step and report all suspicious emails to Information Security by clicking on the phishing button at the top of your Outlook account.

### **Use of Electronic Media**

All communication systems provided by Inspira including computers, email, instant messaging, intranet, internet access, telephone, and voice mail systems are the property of Inspira. Inspira reserves the right to monitor all aspects of the usage of these systems for appropriateness and to ensure such usage supports the business goals of the organization. Users should not assume any of their interactions and communications while using these systems are private.

#### **Email**

The content of all emails sent through the Inspira email network must be accurate, appropriate, and lawful. Self-check using STAR when sending email attachment files, validating the correct

file is being attached. Emails that contain protected health information, sensitive or confidential Inspira proprietary information should be sent using the appropriate encryption standards established by Information Security. This is done by entering ‘###’ in the subject line of the email or using the “send secure” button. Taking a STAR moment will help prevent human error.

Self check by using STAR when sending information to an outside email account as these email locations, (G-Mail, Yahoo Mail, etc.) are not secure. **You must never open an email or email attachment unless you validate and verify you know the sender and the validity of the email. A common practice known as “phishing” can have significant adverse consequences for Inspira and failure to know why and comply with continuous use and reference use of Information Technology protocol can lead a preventable event.**

For more information regarding emails, please refer to Inspira Policy IS-054, “Email and Communication Systems.” The link is:

<https://inspirahealthnetwork.policytech.com/dotNet/documents/?docid=7962>



### Compliance Supports a Culture of Safety

Inspira's Compliance program supports paying attention to detail in both clinical and non-clinical situations using the safety tool **STAR**. STAR stands for:

- **Stop:** Pause for 1 second to focus your attention on the task at hand
- **Think:** Consider the action you're about to take
- **Act:** Concentrate and carry out the task
- **Review:** Check to make sure that the task was done correctly and that you got the correct result



*The message below is included in all external emails received and is an example of self-checking by using STAR (Stop-Think-Act-Review).*

This email **DID NOT** originate from within Inspira Health. Please **take a STAR moment and STOP – THINK – ACT – and REVIEW** before opening attachments, clicking on links, or providing any information.

## Social Media

As a value-based organization, Inspira expects all who represent Inspira to exercise good judgment and personal responsibility whenever using social media such as Facebook, Twitter, LinkedIn, and other social media platforms. Please take a STAR moment and keep the following top of mind:

- Do not post any Inspira confidential or proprietary information to a social media site. This includes photographs and other information regarding patients.
- Do not reference or otherwise associate Inspira when using social media to solicit for, endorse or promote outside business ventures, political candidates, or campaigns or religious causes.
- The use of Inspira provided devices or communication systems to access the Internet or social media sites to view, post, transmit, download, or distribute threatening or harassing materials, profane, obscene or derogatory materials or anything that could rise to a violation of laws or regulations is strictly prohibited.
- Be respectful and professional when using a personal site or account that may identify you as a member of the Inspira community.

Inspira's Social Media policy is available in PolicyTech or by clicking the following link:

<https://inspirahealthnetwork.policytech.com/dotNet/documents/?docid=30826>

Sample questions:

Q. I have a clarifying question, one of my co-workers regularly uses the Internet while at work for personal activities. I am not in a position where I can monitor this person. What should I do?

A. As a High Reliability Organization, you have the responsibility to provide a peer check, if you are met with resistance, you should ARCC the concern up to your immediate supervisor. If this concern continues, you escalate this concern to your Human Resources Business Partner, or the Office of Corporate Compliance. All employees have a responsibility to ensure that resources and assets used each day are used appropriately.

Q. I have a clarifying question, a co-worker frequently posts updates on Facebook and sometimes will make references to his day at work. Although he never mentions any patient names, he sometimes discusses unusual cases in far more detail than I feel comfortable. Should I be concerned?

A. That is a great question, the answer is, yes. Omitting a patient's name does not make it "okay" to discuss on a social media site. Simply omitting a name does not guarantee that the patient cannot be identified. Disclosure of confidential or sensitive information via social media constitutes a violation of deferral privacy laws. This concern should be ARCC'd up to your immediate supervisor. If this concern continues, you escalate this concern to your You should discuss this matter with your immediate supervisor, your Human Resources Business Partner, or report the matter to the Office of Corporate Compliance.

Q. I have a clarifying question, I received an email that looks suspicious. While it appears to be a "business" email, the wording appears odd, and the sender is asking me to click on a link to provide information. What should I do?

A. Thank you for ARCC'ing this up. You may be the victim of a phishing scam. You should click the box "report phishing" on the email screen. Information Security will investigate the email. Under no circumstances should you click on the link or reply to the email. Thank you for reporting this.

## **PATIENT PRIVACY**

Not only do our patients trust us with safe and reliable care, they trust us with their sensitive, personal and confidential information. It is our responsibility to protect this information from inappropriate or unnecessary disclosure. Each one of us is expected to respect patient privacy at all times, even after our employment or other association with Inspira has ended. You may use and disclose the protected health information ("PHI") of patients only as allowed by law and consistent with Inspira's policies and procedures governing privacy and confidentiality.

You must know why and comply with the following:

- We use Protected Health Information (PHI) only when we have a clinical or business need to do so.
- We share PHI with co-workers only when they have a clinical or business need to do so.
- For purposes of payment or health care operations, we use and disclose only the minimum necessary PHI.
- We may not disclose PHI to anyone outside the organization except as authorized by the patient or patient representative as otherwise permitted by law.
- We safeguard all PHI that is within our possession or control and take appropriate steps to make sure that PHI is not lost or accessible to people who do not have the right to access it.
- Accuracy in sharing information with others is very important to our work at Inspira. Paying strict attention to detail ensures that when we release information in the form of records, faxes, emails, mailings and other means it is both accurate and secure.

***My coworker/friend/family member is in the hospital. Can I use my system access to find out how she is doing?***

No—absolutely not! Your coworker/friend/family member is a patient first and foremost, and therefore she is entitled to the same privacy protections as all of our other patients. Patient PHI should never be accessed for personal reasons—even if your job allows system access and even if you just want to check on a friend, coworker, or family member.

***I see the name of my friend on the ICU admission list. Can I go visit her in the ICU?***

No. While you may have seen your friend's name while you were treating another patient, you may not use the information for the personal purpose of visitation. Additionally, without your friend's written authorization, you cannot access her medical record information at any time.

***I saw an interesting case on my unit, and I would like to share the information with a colleague from another unit. While the colleague is not involved with the care, can I still share it?***

You are permitted to share information from the case so long as you do not include any identifying information of the patient you are discussing

***Can I access my own medical record?***

No—not in your capacity as an employee of Inspira. If you wish to view your own medical record you must request a copy from Health Information Management or access the patient portal.

***I just received a call that I faxed patient information to the wrong location, what should I do?***

Call the Office of Compliance immediately at 856-507-7857 and secure the records.

## PROFESSIONAL ELIGIBILITY, DEBARMENT AND EXCLUSION

Inspira expects that all employed and contracted health care providers maintain appropriate professional relationships with their patients, within and outside the clinical setting by following all standards of professionalism established by their respective licensing boards.

You must only perform your work duties within the scope of your licensure, certifications, job description, or other professional standing.

You must only provide services to Inspira within the scope of your current active license, certification or other professional standing. You must report immediately to your immediate supervisor, Human Resources Business Partner, and the Office of Corporate Compliance any adverse action that has been taken against you including, without limitation, suspension, revocation, expiration or lapse of licensure. Likewise, you must immediately tell your immediate supervisor if you have been debarred or excluded from a government-sponsored health care entity.

## QUALITY OF CARE

As a High Reliability Organization Inspira's top priority is to provide safe, reliable and high-quality care, delivered with respect, skill and empathy. Each of us is responsible for maintaining and contributing to the quality of care we provide to every patient. At Inspira, we are all expected to achieve our safety and quality goals and strive to eliminate preventable harm.

Our work in high reliability organizing is a continuous process that leads us to make sure that what is supposed to happen, occurs 100% of the time. All Inspira employees should be mindful that even small failures can lead to catastrophic adverse outcomes. We are committed to, and entrusted with, the safety of our patients.

As a leader at Inspira you must commit to Leading Reliably to Zero Harm by:

### **Messaging on Mission**

- Start meetings with a safety message
- Safety first in decisions
- Protect those who ask the safety question

### **Sensitivity to Operations**

- Daily Safety Briefing
- 4 C's of Rounding
- Rapid Chain of Command

### **Accountability Systems**

- 5:1 Feedback
- Fair and just accountability (PMDG)
- Red Rules

### **Leading Local Learning Systems**

- Unit safety, quality, and service results display
- Learning Boards
- Level 1 & 2 action plans

As an employee at Inspira you must commit to Leading Reliably to Zero Harm by:

### **Pay Attention to Detail**

- Self-Check using STAR (Stop-Think-Act-Review)
- Peer Check

### **Communicate Clearly**

- 3-Way Repeat-Backs and Read-Backs
- Phonetic and Numeric Clarification

- Clarifying Questions
- SBAR (Situation, Background, Assessment, Recommendation)

### **Apply a Questioning Attitude**

- Validate and Verify

### **Know Why and Comply**

- Continuous use and reference use protocol
- Red Rules

### **Speak-up for Safety**

- Speak-up using ARCC (Ask a Question, Request a change, Voice a **Concern**, and Chain of Command)

Inspira leadership is committed to providing you with the tools, education, and support needed for you to be part of our HRO journey.

For additional information, please contact your immediate supervisor, department Safety Coach, or Quality and Patient Safety Team.

## **INTEGRITY IN OUR WORKPLACE RELATIONSHIPS**

At Inspira our Just Culture sets the foundation for how we rely on each other to create a safe and respectful work environment, to exercise good judgment, and be accountable for our commitments. That is why it is so important that we build our work relationships on a Just Culture with integrity. We create and maintain a productive, safe and respectful workplace by fulfilling the following expectations.

### **ACCOUNTABILITY AND DISCIPLINE**

We are confident that employees, providers, board members, volunteers, residents and others who represent Inspira are putting safety first in decision making, directed by the organization's Mission, Vision and Values. Leadership is protecting those that ask the safety question and using this foundation of High Reliability (HRO), this Code of Conduct and other resources made available to you by the organization to help you make the right decisions.

A violation of the standards described in this Code of Conduct – or of any Inspira policy – can result in disciplinary action, up to and including discharge from employment or termination of your contract. Disciplinary action taken by the organization to uphold this Code of Conduct will be imposed fairly and consistently, commensurate with the violation in question and Inspira discipline guidelines and, if applicable, with terms of employment and collectively bargained labor agreements.

### **ALCOHOL, FIREARMS AND CONTROLLED SUBSTANCES**

Inspira maintains a safe and healthy work environment. You may not work while impaired by alcohol or drugs. You may not possess weapons or other contraband while on Inspira property (including in your vehicles while parked in an Inspira lot or garage) or conducting Inspira business. Access to and dispensing of controlled substances is limited to licensed individuals specifically authorized to handle them.

As an employee of Inspira you have the responsibility to ARCC up concerns you have to your immediate supervisor, your Human Resources Business Partner, or the Office of Corporate Compliance.

### **COMPLIANCE EDUCATION**

Compliance education—whether formal group presentations, computer-based training, self-study materials, broadcast communications, department-specific or one-to-one focused training sessions—is an important part of our professional development and commitment to Inspira and its Mission. Because we must all act in compliance with relevant laws, regulations and rules, Inspira expects everyone to participate in required compliance education.

### **DIVERSITY AND INCLUSION**

Inspira strives to create an environment in which the uniqueness of each person, whether

employee, patient, physician, volunteer, or visitor is valued, and where everyone is treated with dignity and respect. An inclusive workplace culture can be achieved by respecting variations in racial, ethnic, gender identity, cultural, socio-economic, national and international backgrounds, employee personality and work style.

Inspira is committed to demonstrating compassion and understanding for diverse cultures, where talents and skills of all employees are respected and valued for maximum personal and business success. We want to ensure that our organization is proficient in diversity and cultural competency, that each of us respects the rights of patients and each other, and that our diversity initiatives support and reflect the community we serve.

We want to continue to build loyalty, pride, and an honest, fair, and ethical culture. We are stronger as an organization when we respect these values.

## ORGANIZATIONAL POLICIES AND PROCEDURES

All policies and procedures adopted by Inspira should be aligned and consistent with the Code of Conduct. The organization or your department may adopt more detailed or more restrictive policies and procedures relating to the standards addressed in the Code of Conduct, and may adopt policies and procedures that are not specifically addressed in the Code of Conduct, so long as they do not conflict with the Code of Conduct. Validate and verify with your immediate supervisor to see if there are additional policies or procedures that apply to you and the work you do.

## ORGANIZATIONAL RESOURCES AND EQUIPMENT

Inspira is legally obligated to protect its property and ensure its facilities and equipment are used appropriately. Resources such as materials, equipment, time and space should be used only for your work, unless your immediate supervisor has specifically made an exception according to Inspira policy. All equipment and supplies provided to you by Inspira are the property of Inspira and theft thereof is strictly prohibited. Any equipment and supplies must be returned to Inspira if your employment ends for any reason whatsoever.

## PERSONAL COMMUNICATIONS

One of Inspira's greatest assets is its reputation, and we are all responsible for maintaining that reputation. You must not publish, post or otherwise communicate negatively or make disparaging statements about Inspira, your coworkers, or patients. This applies to communications in any form—verbal, written, electronic, visual or otherwise. It is up to each of us to bring concerns about the organization to the organization itself, rather than to air our concerns in a public forum. If you, as an individual, choose to discuss your work in a public setting, such as at a conference, personal blog, social media, etc. you must comply with organizational policies on privacy, business confidentiality and conflicts of interest.

There are many resources for information and information sharing, such as email and the internet. If you have access to these resources as part of your work, you must comply with applicable organizational policies.

As an employee of Inspira you have the responsibility to ARCC up concerns you have to your immediate supervisor, your Human Resources Business Partner, or the Office of Corporate Compliance.

## PROTECTION OF PERSONNEL – NON-RETRIBUTION

At Inspira our Just Culture supports our Non-Retribution policy. Retribution against anyone who reports suspected non-compliance with this Code of Conduct, the Corporate Compliance Program, or any organizational policy, is strictly forbidden. You will not suffer any penalty or retribution for reporting any known or suspected concern. Inspira will take appropriate disciplinary action against anyone who penalizes, ostracizes or harasses someone who has reported concerns in good faith. However, this non-retribution policy does not allow people to avoid discipline if they are engaged in improper behavior. Anyone who has been involved in inappropriate activity will be subject to appropriate discipline.

If you believe you have experienced retribution for reporting a concern in good faith, contact your immediate supervisor or Human Resources Business Partner. Alternatively, you can contact the Office of Corporate Compliance, the Compliance Hotline (1-888-413-4313) or make a report on-line at:

<https://inspirahealthnetwork.policytech.com/dotNet/documents/?docid=27885>

## REPORTING CODE OF CONDUCT VIOLATIONS AND OTHER COMPLIANCE CONCERNS

As an employee of Inspira, it is your responsibility to ARCC up concerns you have if you think a business practice or relationship is, or could be illegal or improper.

There are many ways to do this:

- The best place to start is with your immediate supervisor. He or she will be able to identify the policies and procedures we have in place to guide our conduct.
- If you are not comfortable talking to your immediate supervisor, then you should follow the chain of command and contact your Human Resources Business Partner or the Office of Corporate Compliance.
- You may also call the Corporate Compliance Hotline at 1-888-413-4313 or make a report on-line at <https://app.mycompliancereport.com/report.aspx?cid=ihn>. Hotline callers and web reporters remain anonymous unless they voluntarily disclose their identity. All reports to the Hotline must include enough information to investigate concerns raised.

## RESPONSIBILITIES OF MANAGEMENT

Management of Inspira, is responsible for putting safety first in decision making and protecting those that ask the safety question. Management must support and lead with High Reliability (HRO) as the foundation or our Just Culture in support of integrity and in accordance with the Code of Conduct.

- When an employee comes to you with a compliance concern, you must thoughtfully listen, protect those that report the concern and report it to the Office of Corporate Compliance.
- When the organization identifies mandatory compliance-related training, you must ensure that your staff receives that training.
- When compiling an employee's performance review, you must consider whether the employee's behavior has been consistent with the Code of Conduct.
- Never retaliate against or ostracize an employee for raising a compliance concern in good faith.

## HARASSMENT AND DISRUPTIVE BEHAVIOR

Everyone deserves to work in an environment where they are treated with respect, dignity and fairness. Inspira supports equal opportunity employment and complies with federal, state, and local equal opportunity and affirmative action laws. Inspira does not tolerate discrimination based on:

- Race
- Color
- Religion
- Ancestry
- Gender
- National origin
- Pregnancy
- Sexual orientation
- Age
- Disability
- Marital status
- Veteran status

We expect you to treat your coworkers with respect, dignity and fairness. Inspira does not tolerate any form of harassment, sexual or otherwise, or any form of workplace violence or threats of violence. Intimidating and disruptive behaviors can foster medical errors, contribute to poor patient satisfaction and preventable adverse outcomes, increase the cost of care and cause qualified clinicians, administrators, managers and affected employees to seek new positions in more professional environments. Intimidating and disruptive behaviors include, but are not limited to, the following: overt actions such as verbal outbursts and physical threats; passive activities such as refusing to perform assigned tasks or quietly exhibiting uncooperative attitudes during routine activities; 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 shall not be tolerated.

Inspira's Human Resources department has numerous policies regarding its employment practices, and it is important that you familiarize yourself with them by accessing them in PolicyTech or discussing them with your immediate supervisor or Human Resources Business Partner. Policies include, but are not limited to, Affirmative Action, Equal Opportunity, Employment Process, and Anti-Harassment and Non-Discrimination.

Employees are urged to ARCC up any concerns to their immediate supervisor and/or Human Resources Business Partner. The Compliance Hotline is also available at 1-888-413-4313 or you can file a report on-line at: <https://app.mycompliancereport.com/report.aspx?cid=ihn>.

## CONCLUSION

In conclusion, Inspira Health's Just Culture supports a compliance program that helps to prevent, detect and correct violations of the legal, professional and ethical standards we are committed to upholding. The program is designed to support sound decision-making by everyone in the organization.

If you have a question about the Code of Conduct, organizational polices, or have a compliance or privacy concern, it is important for you to speak up for safety and ARCC up your questions or concerns.

You can:

- Discuss the issue with your immediate supervisor;
- Notify the Office of Compliance at 856-507-7857 or email [compliance@ihn.org](mailto:compliance@ihn.org); or
- Report anonymously by calling the Corporate Compliance Hotline at 1-888-413-4313 or filing a report on-line at <https://app.mycompliancereport.com/report.aspx?cid=ihn>.

## Compliance Supports a Culture of Safety

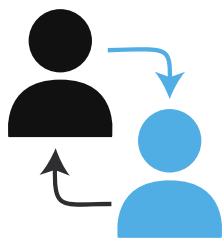


Inspira's Compliance program supports speaking up for safety in both clinical and non-clinical situations using the safety tool **ARCC**. ARCC stands for:

**A**sk a question | **R**equest a change

**C**ommunicate a **concern** | **I**f no success, use the **C**hain of Command

*Compliance supports using ARCC to speak up for safety. If your concern is not addressed, you may "ARCC it up" to Corporate Compliance.*



## Compliance Supports a Culture of Safety

Inspira's Compliance program encourages employees to watch out for each other in both clinical and non-clinical situations using the safety tool **Peer Check**.

Peer check each other's work and be willing to be "peer checked" – and be sure to thank them for doing so!



## Compliance Supports a Culture of Safety

Inspira's Compliance program supports paying attention to detail in both clinical and non-clinical situations using the safety tool **STAR**. STAR stands for:

- **Stop:** Pause for 1 second to focus your attention on the task at hand
- **Think:** Consider the action you're about to take
- **Act:** Concentrate and carry out the task
- **Review:** Check to make sure that the task was done correctly and that you got the correct result

## **Corporate Compliance Hotline**

**1-888-413-4313**

June 2021