



# Standards for Business Conduct



Live so that when your children think of fairness and integrity,  
they think of you.

H. JACKSON BROWN, JR.



Dear Colleagues,

MultiCare Health System presents this Standards for Business Conduct handbook as a resource to all employees, providers, vendors, volunteers, and other partners. This handbook reviews the basics of our business ethics. It is not intended to cover every situation or nuance of ethical decision making. We must all perform that ethical assessment with every business decision we make.

We have many resources at MultiCare to help in the review and education of ethical decision making. No one stands alone. We are all stewards of our reputation in this community and of our assets. As a not-for-profit organization, our mission is quality care for patients in our community. We serve a business mission of being good stewards as a business and as a community partner. Ethics is a pervasive element in all our decisions.

We are governed by a community Board of Directors. The Board provides oversight and direction for our operations, for our finances, and for our compliance efforts. We are subject to many regulatory requirements. The many regulations and the pace of regulatory change create a challenging environment for us. We work hard to comply, to educate, to audit, and to report on our efforts.

At MultiCare, we provide many mechanisms for reporting of issues and concerns. We rely on the integrity and honesty of our employees, providers, and others to ensure we make ethical decisions. We know that questions arise where people need to access a confidential resource. We have confidential compliance phone lines and e-mails. We encourage asking questions and sharing concerns. We have system experts in Compliance, Human Resources, Legal, Quality, Privacy, Security and more. Do not hesitate to ask your questions. Much of what we address is hard to interpret. It is a sign of strength, not weakness, to ask questions.

We will not retaliate against you for asking questions. It is how we learn. If you have questions about what is proper conduct for you and others, promptly raise that concern to your manager or use one of the other reporting channels described in this handbook.

We take compliance very seriously at MultiCare. We are an honest and ethical organization. We rely on all our employees, providers, volunteers, vendors, and other partners to help us uphold our high standards. Our reputation for integrity, built on by so many for 125 years, depends on each patient contact and each business transaction.

Thank you for your support in keeping MultiCare an ethical organization. We appreciate all your efforts.



Diane Cecchetti, RN  
*President and CEO*  
MultiCare Health System

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# The MultiCare Code of Conduct

- Compassionately deliver appropriate, effective, quality care to patients.
- Obey the applicable laws and regulations governing our business conduct, including billing for services.
- Be honest, fair, and trustworthy in all MultiCare activities and relationships.
- Foster an atmosphere in which equal opportunity extends to every member of the diverse MultiCare community.
- Avoid all conflicts of interest between work and personal affairs.
- Keep business transactions with suppliers, contractors, and other third parties free from offers or solicitation of gifts and favors, or other improper inducements.
- Sustain, through leadership at all levels, a culture where ethical conduct is recognized, valued, and exemplified by all employees.

**Report concerns through appropriate MultiCare channels.**

# MultiCare Mission, Vision, Values

**Our Mission:** Quality Patient Care

**Our Vision:** To create a seamless, easy, valued and sustainable continuum of health care that enhances the experience of our patients, providers, caregivers and employees.

**Our Values:**

- Excellent clinical outcomes
- Exceptional customer service
- Dedication to patient safety
- Community service and partnership
- Clinical expertise
- Innovative health care delivery
- Financial sustainability
- Employee development
- Clinical and business ethics

## Reporting Issues and Concerns

*MultiCare and its affiliates include a multitude of different businesses: home health, hospitals, physician offices, behavioral health and other outpatient centers. Within each of these businesses, there are complex, ever-changing rules and regulations that govern each particular type of service. We recognize that this can create areas of uncertainty for employees who carry out daily operations. Questions and concerns about the correct way to handle different situations may, and often do, arise. We encourage employees to use the following mechanisms to find the answers they need.*

- 1. If you're in doubt about an issue or you have a concern, ask!** Keep asking until you get an answer that makes sense. Is the action legal? Is it consistent with MultiCare policies and procedures? With MultiCare values and principles?
  - If you know it is wrong, don't do it.
  - How would you feel if you did it?
  - How would it look to family, friends, patients, and the community?
- 2. Follow the reporting process.** Remember that it is always better to raise a question before taking an action that may be improper. It is MultiCare policy to ensure that no employee is penalized for raising an issue or concern.
- 3. If you identify any compliance issues, fraud situations, or other inappropriate or illegal activity, report it!** Every MultiCare employee has an obligation to report the wrongdoing immediately. Failure to report a concern may result in disciplinary action.

### Reporting Process

- ➔ Discuss the issue with your immediate supervisor. If you are not comfortable discussing the issue with your supervisor, go to the next step.
- ➔ Discuss the issue with a higher-level manager where you work. If you are not comfortable taking this step, go to the next step.
- ➔ Discuss the issue with another MultiCare resource, such as (but not limited to):
- ➔ Human Resources, Legal Services, the MultiCare Compliance Office, or go to the next step.
- ➔ Call the MultiCare Confidential Message Line at 253-459-8300, 253-697-2100 or toll free at 866-264-6121. You can also e-mail to [compliance@multicare.org](mailto:compliance@multicare.org) or [compliance@goodsamhealth.org](mailto:compliance@goodsamhealth.org).

## Confidential Message Line

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**253-459-8300 • 253-697-2100**

**866-264-6121**

**email: [compliance@multicare.org](mailto:compliance@multicare.org) • [compliance@goodsamhealth.org](mailto:compliance@goodsamhealth.org)**

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MultiCare has established a Confidential Message Line that is available to all members of the MultiCare community. Anyone—employee, physician, vendor, volunteer or patient—may call the Confidential Message Line to ask questions concerning ethical or legal conduct or to report any potentially improper action. All reports are confidential and the staff of the Confidential Message Line will address all reasonable questions and concerns. Calls to the Confidential Message Line are not recorded (unless the caller chooses to leave a message) and no caller will be subject to retaliation or reprisal for expressing his or her concerns in good faith.

The Confidential Message Line is not intended to replace established communication channels, such as talking with your supervisor, but provides an additional method of communicating when a member of the MultiCare team is uncomfortable using other channels or needs additional assistance.

The Confidential Message Line is answered during normal business hours by a staff member under the direction of the Compliance Officer. The Compliance Office will initiate an investigation of appropriate matters reported to the Confidential Message Line that cannot be otherwise resolved.

### Questions or Concerns?

Ask your resources:

- Chain of command
- MultiCare resources
- Call the Confidential Message Line at 253-459-8300, 253-697-2100 or 866-264-6121. Email: [compliance@multicare.org](mailto:compliance@multicare.org) or [compliance@goodsamhealth.org](mailto:compliance@goodsamhealth.org)



No amount of ability is of the slightest avail  
without honor.

ANDREW CARNEGIE

## Fair Treatment of Employees

**Treat all employees with respect, dignity, and fairness.**

It is the responsibility of members of the MultiCare team to create and maintain a work environment in which employees are treated with respect, diversity is valued, and opportunities are provided for development. Harassment or abuse of any kind is prohibited in the MultiCare workplace. MultiCare also prohibits discrimination in any work-related decision on the basis of race, creed, gender, age, disability status, national origin, sexual orientation, marital status, or any other illegal basis.

If a MultiCare employee perceives that inequitable or unfair conduct is occurring in the workplace, the employee should utilize the existing “grievance” or problem resolution processes already available within the organization. If the employee feels that use of these resources does not resolve the matter, the employee may contact the Director of Human Resources or the Confidential Message Line.

### Questions and Answers

**Q:** *I believe I was not selected for a promotion because of my age (or gender, national origin, race, disability status, etc.). What should I do?*

**A:** Contact the Human Resources (HR) representative where you work. The HR representative will be able to address the qualifications for the position and discuss your concerns with the hiring manager.

**Q:** *I know an employee who is occasionally offended by the language and inappropriate humor the supervisor uses when speaking with employees. What should I advise the employee to do?*



# Good Samaritan Mission, Vision, Philosophy

## Our Mission:

We provide quality health care in the compassion and spirit of Christ's love. We meet individual and community needs as a team, reflecting our belief that health is wholeness in body, mind and spirit.

## Our Vision 2012:

Good Samaritan is the trusted regional medical center of choice for every person in East Pierce County.

## Philosophy of Care:

We enrich the well being of every life we touch in an environment where healing is promoted and all are honored.

**A:** Advise the employee to tell his or her supervisor that he or she finds the language and humor offensive. If the employee is not satisfied with the results (or is uncomfortable speaking directly with the supervisor), then the employee should discuss the situation with the supervisor's manager or with a Human Resources representative.

**Q:** *Our department recently hired a new manager. Since her arrival, I have been penalized for tardiness and absenteeism. There are other employees in my department with worse records than mine and I don't see them being treated in this way. I am concerned it is because of my (ethnicity, or national origin, gender, age, disability, etc.). What should I do?*

**A:** MultiCare prohibits unequal treatment of employees if such treatment is based on bias or discrimination. If you feel comfortable doing so, discuss your concerns with your supervisor first. If you don't feel comfortable or you are not satisfied with your supervisor's response, notify your Human Resources representative. Provide examples of these incidents and state your concerns. Unequal or unfair treatment from one's supervisor is an appropriate concern, requiring management where you work to look into your concerns.

**Q:** *I recently observed a physician where I work doing something I believe to be improper. I believe I should tell someone about this, but I do not want to be considered a snitch or get in trouble for upsetting one of our doctors. How should I proceed?*

**A:** Even if the physician is a leading admitter, you should raise your concern through appropriate channels. It is important for you to come forward with pertinent information related to any potential misconduct by a member of the MultiCare team. If you are comfortable doing so, you may wish to discuss the situation with your immediate supervisor or the manager in charge of your work area. If you do not feel comfortable approaching your supervisor or manager, you may contact either your Human Resources representative, Legal Services, any member of administration or you may call the Confidential Message Line. Allegations of physician misconduct are normally handled through the medical staff process. While using this process takes time, MultiCare is committed to fair resolution of allegations against any member of the MultiCare team.

**Q:** *My supervisor has secretly recorded conversations with his manager. That doesn't seem right to me. What should I do?*

**A:** No employee should record conversations without the express, written consent of the individual(s) being recorded. To do so without permission is a violation of the other person's right to privacy and a crime under both Washington state and federal law. Notify your supervisor's manager, your Human Resources representative, or a higher level MultiCare resource.

## Substance Abuse

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**MultiCare is committed to providing a drug-free work environment.**

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It is MultiCare's intent to maintain a drug-free workplace, to provide a safe and healthful working environment for all employees, and to comply with all applicable laws governing this area. We also take seriously our responsibility to ensure public safety.

It is prohibited under MultiCare policy to be under the influence of alcohol or other unauthorized controlled substances while at work. This includes all providers of care, employees, volunteers and contractors. MultiCare has an employee assistance program to support employees as needed.

**Q:** *I think one of my co-workers has had alcohol on his breath. He has been taking care of patients and one patient also complained about this. What should I do?*

**A:** Report this to your supervisor and/or Human Resources immediately. Our first action must be to ensure patient safety. The employee needs to be removed from patient care responsibilities while this is being investigated.

## Workplace Violence

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**MultiCare is a safe place to work.**

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MultiCare is committed to providing a safe environment for its employees, patients, and visitors. We will take all necessary steps to reasonably prevent and protect employees from work place violence. Some of MultiCare's actions to address work place violence include on-going mandatory education for employees and the requirement for MultiCare employees to wear badges for identification. The Security department can provide departmental education as needed.

**Q:** *I heard that several youths were loitering near the parking garage as I was about to leave from my evening shift. I felt very uncomfortable about going to my car alone. What should I do?*

**A:** Call Security to arrange for an escort for you to your car. We provide this service to our employees for their protection.



# There is no such thing as a minor lapse of integrity

TOM PETERS

## Disciplinary Measures

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**Every employee has a duty to report issues and concerns.**

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MultiCare has many policies requiring employees to adhere to legal and quality of care practices. When these requirements are violated, certain disciplinary actions may occur. Depending on the severity of the situation, these disciplinary measures may include a verbal discussion, a progressive guidance step or termination. There are policies outlining our practices in given situations. These are on the MultiCare intranet, under Policies. We have both a Human Resource policy as well as a more strict Compliance policy.

MultiCare encourages the reporting of issues and concerns for illegal and inappropriate activities. For each report, an investigation is conducted. Based on the findings, certain disciplinary actions may be appropriate. Violations of policy, actions that jeopardize patient care or safety, and any fraudulent or illegal activity may result in disciplinary actions.

Under no circumstances does MultiCare tolerate retaliatory behaviors for the reporting of legitimate issues and concerns.

**Q:** *Our department recently hired a new manager. Since her arrival, I have been penalized for tardiness and absenteeism. Due to personal issues I have not been able to make it to work on time all the time. What should I do?*

**A:** You can talk to your supervisor about your specific situation to see if accommodations can be made to your schedule. However, under the current schedule, if you are late to work or are absent, you may be disciplined under our policy. As the employer, we rely on our staff to be ready for service at the start of their assigned shifts. Excessive tardiness or absenteeism may result in progressive guidance or termination of employment.

## Patient Care

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### **Compassionately deliver appropriate, effective, quality care to our patients.**

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Patient care must be appropriate and designed to meet the intended outcomes of the patient's plan of care. The need for medical care can cause stress, anxiety and fear. Patients must always be treated with sensitivity, kindness, respect, and professionalism.

We shall continue to seek new approaches to increase the quality of care delivered to our patients while ensuring that care is delivered in a cost-effective manner.

We shall observe all applicable standards of professional practice in all MultiCare facilities and programs.

### **Questions and Answers**

**Q:** *I am a clerical employee working in a clinical setting. I noticed that a child who had come to the doctor for a DPT immunization had actually received only a DT vaccine. When I mentioned this to the nurse, she seemed annoyed but said she would take care of it. Have I fulfilled my responsibility if I am still uncertain that appropriate follow-up has occurred?*

**A:** If you remain uncertain that appropriate action has been taken, continue to pursue the issue. This will require tact, because you cannot assume that the nurse did not address your initial observation. If you are not comfortable asking what follow-up occurred, speak to your supervisor and request that he or she follow up for you. Mistakes can occur in even the best-managed medical practice. Quality patient care requires vigilance from everyone involved.



## Patient Rights

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### **MultiCare respects the rights of patients.**

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MultiCare respects the rights of patients. These rights include, but are not limited to, a patient's right to privacy, to receive care in a safe setting, to be informed of their rights and responsibilities, to be involved in their care decisions, and to be free from all abuse and harassment. All MultiCare employees, volunteers and contractors support and abide by the rights of patients who seek our services.

The law provides for additional protections for adolescent patients.

#### **Questions and Answers**

**Q:** *I have a concern that my care was not provided in a timely manner. What should I do?*

**A:** MultiCare has a Concern/Complaint/Grievance process that you can use. You can call the Customer Service line at 1-800-247-2366 or write to us at Grievances, Multicare Health System, Attn: Service Recovery 419-2-CN, PO Box 5299, Tacoma, WA 98415-5299.

**Good Samaritan Hospital** has a Concern/Complain/Grievance process that you can use. You can call Customer Relations at 523-697-1950 or write to us at Customer Relations, Good Samaritan Hospital, 407 14th Ave. SE, Puyallup, WA 98371.

## Ethical Business Practices

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### **Display good judgment and high ethical standards in your business decision-making.**

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Business practices will be conducted with integrity, honesty and fairness. These qualities are demonstrated through truthfulness, the absence of deception or fraud, and respect for the laws applicable to our business. Acting with integrity is the responsibility of every member of the MultiCare team irrespective of facility, location, or job.

#### **Questions and Answers**

**Q:** *I have found that our competitors are providing illegal inducements to physicians and are hindering our ability to compete. What should I do?*

**A:** Improper behavior by a competitor does not justify similar behavior on our part. Notify your supervisor of this situation, providing any facts available to you. It is your supervisor's responsibility to notify MultiCare Legal Services and/or Executive Management so that MultiCare can take appropriate action.

**Q:** *My supervisor directed me to do something that I believe is against MultiCare policy and, perhaps, the law. I don't want to do something improper, but I'm afraid if I don't do as I am told, I may lose my job. What should I do?*

**A:** Consider discussing the request with your supervisor to be sure you understand the facts and that he or she is aware of your concern. If you cannot comfortably discuss the situation with your supervisor or cannot resolve your concern at this level, approach a more senior manager. Other resources that may be used are MultiCare Legal Services, Human Resources, and the Compliance Office. The Confidential Message Line is another alternative that may be used. Do not risk your job or the organization's future by taking part in an improper activity — there are appropriate actions you can take. MultiCare strictly prohibits retaliation against employees who raise such concerns honestly and forthrightly.

**Q:** *If I suspect that a fellow MultiCare employee is violating a company policy or the law, whom should I contact?*

**A:** The ability of MultiCare to uphold its ethical standards depends on employees taking action if they believe a violation is occurring. Use the MultiCare reporting process. If possible, start with your supervisor and explain the issue to her or him.

If you don't get the issue resolved at this level, contact a more senior manager. Continue this process until you get an answer that makes sense to you. If you are uncomfortable discussing the issue with someone at your location, you may call the Confidential Message Lines at 253-459-8300, 253-697-2100 or 866-264-6121 or e-mail to [compliance@multicare.org](mailto:compliance@multicare.org) or [compliance@goodsamhealth.org](mailto:compliance@goodsamhealth.org).

**Q:** *One of the state surveyors is an old friend of mine from our days in the military. I joined MultiCare and my friend became a surveyor. During the survey of our hospital, I invited my friend (the surveyor) to have dinner with me later that evening. We both avoided discussing the survey. Is this acceptable?*

**A:** Our ethical standards require that we avoid even the appearance of impropriety. Explain the situation to your friend and avoid socializing with her or him until well after the survey has been completed and the survey recommendations are submitted to the hospital.



## Billing Practices

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### Ensure that bills are accurate and honest at all times.

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MultiCare bills only for services actually rendered. Services rendered must be accurately and completely coded to ensure both proper billing and integrity of the medical database. Billing must comply with the requirements of state and federal payers and conform to all payer contracts and agreements.

Medical documentation must be recorded for all services rendered. Always bill on the principle that if the appropriate documentation has not been provided, the service has not been rendered. Medical records may be amended to correct an error or complete documentation only in accordance with established medical records procedures — and not for the purpose of covering up errors or obtaining any payment to which we are not entitled. Medical records may not be erased or altered.

Billing data must be retained for periods described by law and by MultiCare policies that may require a longer period of retention in some cases. Clinical, administrative, or clerical staff involved in the preparation and/or submission of charge or billing data must be trained in coding and documentation practices. Billing policies and procedures must be written, approved by management, and appropriately updated. These policies and procedures must be available to all employees involved in the creation of charge or billing data. Charges will be consistent for all payers and will be established through the Finance Department. Specific payer requirements will be followed.

When any payer agreement requires the collection of co-payments and/or deductible amounts, these amounts will be collected to the full extent of the agreement. MultiCare does not waive co-payments or deductibles.

Employees who suspect that improper billing or documentation is occurring should immediately alert their supervisor or a higher level manager. Additionally, any employee may call the MultiCare Confidential Message Line if the issue remains a concern.

### Questions and Answers

**Q:** *Patients sometimes call MultiCare Patient Financial Services asking what diagnosis the doctor used for a visit or laboratory test. How can I tell a patient that I am not allowed to discuss this information without annoying the patient and causing a customer service complaint?*

**A:** Tell the patient, “I would like to be able to help you, but all medical information must come from a clinical area so that patients are not provided with misinformation.” Some organizations have other avenues or specific individuals who can

provide this information without involving the clinical areas or offices. The main idea is to always first affirm that you would like to help, however, you are not authorized to provide the assistance or information. Additionally, some clinical information is restricted with respect to disclosures. MultiCare policy outlines what information can be disclosed and to whom.

**Q:** *Physicians or nurses sometimes call the Physician Billing Office to correct or change a diagnosis in response to a patient complaint about claim reimbursement. Should providers or their employees call to correct or change information related to patient accounts?*

**A:** Corrections to medical claim information should only be made by the provider who submitted the original information or by a coder. Additionally, all changes to claim information must be supported by medical record documentation prior to initiating changes.

**Q:** *Patients may call physicians and ask them to change their medical coding (either CPT or ICD9) in order to obtain better insurance reimbursement. If a physician requests that the Physician Billing Office make these changes, is this appropriate?*

**A:** It is only appropriate to make coding changes if the changes are legitimate corrections and the medical record documentation supports the requested changes. If you are uncertain that what you are being asked to change is legitimate, have the patient's medical record reviewed by the provider or a coder before making any change. Provider documentation should support the clinical findings and not be altered to enhance reimbursement or to reduce patient liability.





**Q:** *The supervisor of my billing department issued a memorandum indicating that while it may be technically unlawful to bill for certain medical devices, he knows from a conversation with colleagues in neighboring hospitals that everyone is ignoring the Medicare directive. I feel uneasy with these instructions. What should I do?*

**A:** In this case, if you feel comfortable doing so, discuss your concern with the supervisor. If you aren't satisfied with his or her explanation or you don't feel comfortable approaching him or her on this issue, contact his or her supervisor. Keep asking questions until you get an answer that makes sense to you. Many MultiCare resources are available to you, including the Confidential Message Lines 253-459-8300, 253-697-2100, toll free at 866-264-6121 or e-mail to [compliance@multicare.org](mailto:compliance@multicare.org) or [compliance@goodsamhealth.org](mailto:compliance@goodsamhealth.org).

**Q:** *I am a newly hired nurse with the MultiCare Home Health division. I was directed to make site visits to home health patients. I discovered that 20% of the patients were capable of walking to and from the senior citizen's center and to the grocery store. Should I report this?*

**A:** You should report your observation to your manager or supervisor. If you are unable to resolve your concern in this way, raise your concern with another MultiCare resource or the Confidential Message Line. If you think that services you are requested to provide are not needed or are not appropriate, take action to ensure that they are not billed until your concern is resolved.

## Fraud and Abuse

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### **Ensure that bills are accurate and honest at all times.**

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As an organization with high ethical standards, we want to ensure that all our bills are accurate. We encourage all employees to report billing issues and concerns to the appropriate parties at MultiCare—Patient Financial Services, Compliance, Legal, or through your supervisory chain of command. We will not retaliate against you for reporting legitimate issues and concerns. All employees, patients, physicians, and vendors also have the right to report mis-billings to the government at any time. MHS has policies which describe our responsibilities under the federal Fraud and Abuse statutes.

## Accuracy of Records

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### **Prepare and maintain all patient and company records accurately and retain such records for periods prescribed by law and by MultiCare policies.**

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Ensure that all patient and business records for which you are responsible are accurate and complete.

Patient records must conform to accepted standards for the maintenance of such records and shall not contain false or misleading information.

Company books and records shall not contain false or misleading information. Financial transactions should be recorded in accordance with generally accepted accounting principles and MultiCare policies and standards. MHS is committed to compliance with legal requirements for all state and federal filings including the Medicare cost report, the IRS 990 tax filing and others.

MultiCare maintains records for the required time frames as required by MultiCare policy and in accordance with applicable laws.



## Questions and Answers

**Q:** *I'm an accountant at MultiCare, and a senior manager told me how to record a transaction. These instructions were not in compliance with generally accepted accounting principles or MultiCare guidelines. What do I do?*

**A:** Try to explain the accounting requirements and the reason the transaction cannot be recorded as instructed. If you are unable to resolve the situation with this manager, contact the senior manager's supervisor, the Controller, the Vice President of Finance, or the Confidential Message Line.



**Q:** *I just received a pay increase. My supervisor told me my new rate would be \$12 per hour, but the first paycheck after the raise was effective reflects a \$21 per hour rate. What should I do?*

**A:** Contact your supervisor immediately. Your supervisor will work with payroll and Human Resources to determine what happened and to ensure you are paid at the appropriate rate.

**Q:** *I am an RN at a MultiCare facility. A fellow RN called me from home after she completed her shift. She told me that she forgot to enter an order for a change in medication for a patient that had been phoned in at 9:00 a.m. by the patient's physician. The nurse asked me to log the change into the patient's chart at the appropriate time, 9:00 a.m., and to use her initials. She said charts are often updated in this way and no harm is done. Is this okay?*

**A:** While the nurse did the right thing by calling to note the chart error, the error should be promptly reported to the shift supervisor. You should never record an order you did not hear and never sign someone else's signature or initials. Even if no harm occurred in this case, the error needs to be reported. If you fear retribution from other nurses, bring your concern to the attention of your supervisor. MultiCare does not tolerate retaliation against employees for promptly reporting errors or omissions.

**Q:** *I am a new accountant in the finance department. I happened to review a draft of an official statement that was being finalized. I noticed that some of the financial data was incorrect. Should I assume someone else will catch this mistake or should I report the error?*

**A:** Immediately bring this information to the attention of your supervisor. If an official statement is published with incorrect information, there can be serious consequences for the company and those in charge of preparing the document.

## Confidentiality of Information

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**Protect MultiCare confidential and proprietary information including patient information. Observe copyrights, trademarks, and/or licenses, and safeguard the intellectual property of MultiCare and of those with whom we do business.**

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Never disclose confidential patient information to any unauthorized person. MHS is committed to protecting the privacy of our patients' health information.

Information obtained, developed or produced by MultiCare and its employees, information supplied by outside consultants or vendors for the benefit of MultiCare, and information about MultiCare customers is confidential. This information should not be disclosed to anyone outside of MultiCare, including friends, family, relatives, business or social acquaintances, customers, suppliers, or others. Unless you have specific authorization, do not disclose this information to other MultiCare employees except on a "need to know" basis and with agreement of the recipient to treat the information as confidential.

MultiCare will take reasonable steps to prevent copying or unauthorized use of copyrighted or licensed materials and to ensure that all proprietary information entrusted to the company is safeguarded.

### Questions and Answers

**Q:** *Who has access to my personnel records and wage information?*

**A:** Personnel records and wage information are confidential. Access to personnel files is limited to representatives of management and Human Resources who need access to these records. You may also review your personnel records.

**Q:** *Medical Records occasionally receives calls from patients wanting copies of their medical records. Can we provide this information?*

**A:** Generally, patients are entitled to receive copies or summaries of their records. There are many exceptions to this rule (e.g. minors, mental health patients). MultiCare policy outlines how and to whom protected health information can be disclosed. If there is a question, get advice from a Medical Record's Supervisor or Legal Services before releasing any medical record information.

**Q:** *I received a call from a former MultiCare employee's new employer asking questions about the employee's performance while at MultiCare. Should I give out this information?*

**A:** Information concerning employee performance is confidential. Refer all such calls to Human Resources.



**Q:** *Sometimes there is insufficient budget for a software package I need on my computer. Can I copy the software from another MultiCare computer as a temporary measure, as long as I delete it later?*

**A:** Copying software often violates copyright laws or licensing agreements. Illegally copying software is not acceptable under any circumstance. Unless MultiCare has been granted specific permission by the software creator or seller, a program should not be loaded onto more than one personal computer at a time. For every workstation, multi-user system, or mainframe that contains a program, a separately purchased software license is required. Installing freeware or shareware or software from a home computer also violates MultiCare policy unless you have obtained specific approval to do so from Information Services. Consult with Information Services before installing or copying software on any MultiCare computer.

**Q:** *A coworker who developed training materials (software program, audit process, etc.) for MultiCare is marketing these materials on his own time to other companies. He intends to keep the proceeds for his own use. Is this ethical?*

**A:** Generally, MultiCare owns all proprietary information including “intellectual property” (computer programs, training materials, processes, marketing strategies) created by employees while on the job or while using MultiCare resources. This is a complex area and you should raise this issue with your supervisor or Legal Services. MultiCare proprietary information may not be used for personal gain.

## Government Investigations

**Cooperate with legitimate government investigations. Government investigations are a fact of life in today's healthcare environment and procedures for cooperating with these investigations may be complex. If you become aware of an investigation, seek guidance from MultiCare Legal Services.**

If a MultiCare employee is approached by any person who identifies him or herself as a government investigator, the employee should contact Legal Services immediately. When calling Legal Services, notify the person taking the call that you are calling concerning a potential government investigation. Legal Services will assist in verifying the credentials of the investigator, determining the legitimacy of the investigation, and following proper procedures for cooperating with the investigation.

In some cases, government investigators, or persons presenting themselves as government investigators, may contact employees outside of the workplace, during non-work hours, or at home. Do not feel pressured to talk with the person under such circumstances without first contacting Legal Services or your personal attorney. It is the legal right of employees to contact legal counsel before responding to questions by an investigator.

MultiCare employees must never:

- destroy or alter any company document or record in anticipation of a request for the document or record by a government agency or court,
- lie or make false or misleading statements to any governmental investigator, or
- attempt to persuade any other company employee, or any other person, to provide false or misleading information to a government investigator or to fail to cooperate with a government investigation.

Should a MultiCare employee receive a subpoena or other written request for information (such as a Civil Investigative Demand regarding MultiCare), the employee should contact Legal Services immediately and before responding.

### Questions and Answers

**Q:** *The local district attorney called and asked me to give a statement regarding MultiCare's treatment of a particular patient. Should I respond?*

**A:** We have a responsibility to protect patient confidentiality. Do not provide confidential patient information to the person who identifies himself or herself as a district attorney until you have spoken with Legal Services.



**Q:** *What should I do if an FBI agent comes to my home and asks to talk to me about the activities of my department?*

**A:** MultiCare cannot prohibit you from talking to a government investigator if you wish to do so. However, you may consult with Legal Services or your personal attorney before answering any questions. Asking to speak with legal counsel before answering questions is your right and in no way indicates that you are not cooperating fully.

## Special Legal Responsibilities

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### Antitrust

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Compete fairly and in compliance with all antitrust laws. In order to succeed in today's healthcare marketplace, each of us must be committed to competing vigorously on behalf of MultiCare. But we draw a line between competing vigorously and competing unfairly — and we must never cross that line.

It is unlawful to agree, or attempt to agree, with competitors to fix prices, divide geographic markets, or make any agreement that raises the price of our services or improperly reduces competition. Particular care should be taken in pursuing joint ventures or alliances with other healthcare providers.

Seek advice from your supervisor or manager before taking any action that may compromise fair competition or compliance with antitrust laws. Supervisors and managers contacted concerning antitrust matters should immediately contact Legal Services.

### Inside Information

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No MultiCare employee shall buy or sell stock or other securities based on inside information.

Inside information is information that is not generally available to the public and that could be viewed as material in determining whether to trade a company's securities. Federal laws prohibit trading stock or other securities based on inside information. These laws also prohibit giving inside information to another person, even if you do not receive personal financial benefit.

Check with Legal Services before you trade stock or any security (such as a bond or option) when you may have inside information. You may not disclose inside information to any person, including family members. Take precautions to prevent unauthorized disclosure of inside information that comes into your possession.

## Questions and Answers

**Q:** *I have a friend in the Managed Care department of one of our competitors. She has been asked by her company to survey managed care prices in the region. Can I give her copies of price lists and bids?*

**A:** No. Any sharing with competitors of pricing information not normally available to the public could be perceived as, or be legally treated as, an effort to fix fees or limit competition.

**Q:** *I sometimes attend trade shows or professional meetings at which I run into old friends who work for competitors of MultiCare. Are there subjects that I should avoid?*

**A:** Avoid anything that affects competition in the marketplace including prices, pricing policy, profit margins, or credit and billing practices. Trade shows, professional meetings and other gatherings pose problems when competitors “talk shop”. The most serious problems often arise in informal gatherings (e.g. lunch or dinner after the meeting has concluded). Stay away from any business discussions with competitors.

## Marketing

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**Represent MultiCare services and products fairly and honestly, stressing their value and our capabilities.**

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MultiCare and its affiliates will advertise to inform the community of the availability and value of our services and products, to provide educational information about personal health, and to inform the public of MultiCare’s views on public policy issues related to health care. MultiCare does not sell or use protected health information in its marketing activities.

MultiCare is perceived as a reliable, authoritative source of information about medical care and the health care system. We should remain mindful of the trust the public places in us to provide accurate, balanced information.

- Advertising should be honest and accurate and, when presenting views on issues, clearly distinguish opinion from factual data.
- Advertising should not disparage, demean, or caricature competitors, customers, or patients.
- Advertising should not exploit customer or patient fears as a key motivating factor.



### Questions and Answers

**Q:** *A recent government report ranked hospitals for their care of patients with a particular disease. Our facilities ranked high and our competitor ranked low. Should we inform the public of this information?*

**A:** We may certainly include reference to a good rating of our performance when discussing MultiCare and its services in advertising and informational materials. In doing so, we should evaluate whether we consider the reporting agency a reliable source and what we would be saying about the report if our ranking had been lower.

Direct comparisons of our ranking with competitors should not be the focus of our advertising. We may use phrases such as “the only health system in the South Sound”, but we will not reference the performance of other organizations, letting the public seek that information from other sources.

**Q:** *There was a recent newspaper article about the harmful effects of coffee drinking on heart disease. Should this information be used in advertising an upcoming seminar on heart disease?*

**A:** The public looks to MultiCare for reliable medical information. To retain that trust, data used in our advertising should be carefully researched and substantiated over time. We should not buy into scare tactics or create confusion in the minds of the public. If there are well-established facts about lifestyle risks for heart disease that may influence people to change their behavior, it is reasonable to use those facts in advertising and printed materials.

**Q:** *There is an important new medical procedure available in our facility, which shows great promise for the future of medical care. Shouldn't we promote it as widely as possible?*

**A:** While we should be proud of the cutting-edge technology available at MultiCare facilities, we must use caution when promoting these capabilities. In designing advertising and other public information, ask yourself:

**Will all the potential patients in my audience have access to this procedure?**

If there are restrictions based, for example, on an individual's qualifications to participate in a clinical trial, a narrow range of medical conditions the procedure can treat, or issues of reimbursement by health plans, clearly state those restrictions when describing the procedure.

**What kind of track record does the procedure have?**

We should make every effort to help patients evaluate all treatment options, through the availability of our public medical libraries, education programs, and advice nurse services.

**Q:** *Drug companies occasionally offer to provide educational materials with their company names on it. This seems like we would be endorsing their product. Can we do this?*

**A:** We do not endorse any particular product or vendor at MultiCare. We should not represent to our patients that we support their use or purchase of any particular product. Vendor logos may appear on marketing or educational materials provided by MultiCare as a sponsor of the activity or event, but not as an endorsement of the vendors' goods or services.



## Conflicts of Interest

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### **Avoid conflicts of interest and the appearance of conflicts of interest.**

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A conflict of interest occurs if an outside interest or activity may influence or appear to influence your ability to exercise objectivity or meet your job responsibilities for MultiCare. Participation in activities that conflict with your employment responsibilities at MultiCare is not acceptable.

A good rule of thumb is that a potential conflict of interest exists any time an objective observer of your actions might wonder if these actions are motivated solely by your responsibilities to MultiCare.

MultiCare employees and their families are prohibited from receiving gifts, loans, entertainment or any other consideration of value from a person or organization that does business or may want to do business with MultiCare. If a MultiCare employee receives any substantial gift or favor, it must be returned and the employee's supervisor must be notified. The only exception is a gift of nominal value extended as business courtesy, such as sales promotion items or occasional business-related meals or entertainment of modest value.

In no case may a MultiCare employee accept a gift or consideration of more than \$100 or any cash payment. Gift certificates are considered cash. This is on a per vendor per year basis.

Many times patients and their families want to recognize exceptional service of our staff. Gifts and gratuities of nominal value may be accepted including flowers, candy or gift baskets of less than \$100.

In no case should a MultiCare employee offer or give any gift or any consideration of value that may appear to be intended to influence the objective judgment of anyone outside of MultiCare. If you could not accept a gift or consideration within MultiCare guidelines, do not offer one.

Frequently, managers and staff of MultiCare may participate in vendor-sponsored travel to preview equipment, systems installations or other demonstrations. Any vendor sponsored travel or entertainment must be reviewed and approved by the second level supervisor in order to avoid any appearance of conflict of interest. Vendor sponsored travel for educational purposes of staff or management may be accepted if it addresses a specific and pertinent educational need and must be approved by a second level supervisor.

## Questions and Answers

**Q:** *I have an outside business selling fitness products. Can I use company bulletin boards or interoffice mail to advertise these products to other MultiCare employees?*

**A:** No. Products and services not offered by MultiCare should not be promoted during working hours or on MultiCare property. Neither should you use MultiCare's name, its facilities, or resources (e.g. telephones, copiers, e-mail or your work time) to sell non-MultiCare services or products. However, you are free to engage in an outside business, which does not pose a conflict of interest with MultiCare, on your own time and off company premises.

**Q:** *My supervisor is about to contract with a coffee vendor for a new coffee kiosk in our facility. My wife owns a coffee kiosk business. Would it be a conflict of interest if I recommended my wife's company?*

**A:** Generally, MultiCare avoids contracting goods or services with family members of employees. Do not take any action that may create the impression that you are attempting to influence a MultiCare purchasing decision in favor of a family member. As long as you and your wife stay out of the purchasing decision and disclose the relationship, the company will be able to reach an objective decision.

**Q:** *Many airlines, hotels and rental car companies have frequent traveler programs through which I can receive free trips, car rentals or hotel stays for my personal use. Does MultiCare allow me to accumulate these points for MultiCare travel?*

**A:** Yes, you may use these credits as long as you are aware of certain responsibilities. You must be sure that you haven't cost MultiCare additional expenses by scheduling a particular routing, carrier, or trip simply to pursue these credits. The trip should be clearly necessary and use the most cost-effective carrier, routing, and services. Employees should be able to clearly explain their choices of timing, routing, location, and carrier.

**Q:** *In appreciation for our business, suppliers to MultiCare occasionally invite me out to dinner or sports events. Is it acceptable for me to go?*

**A:** In the absence of specific department policy prohibiting such activities, you may accept these types of invitations if they are within the bounds of the law, good taste, moderation, and common sense. Your activities must not only be acceptable according to company policy but must also avoid creating an appearance of improper behavior. If you have purchasing authority however, you must take care to ensure that this could not be perceived as a conflict of interest. It must also be of nominal value.

**Q:** *I am responsible for auditing expense reports. Once, I received a report covering the purchase of gifts totaling several hundred dollars bought for one of our physicians who refers a number of patients to us. Is that acceptable?*

**A:** While such gift giving may have been common in health care at one time, any gift or consideration of value that may appear to be an inducement for referrals is prohibited by MultiCare. Bring this situation to the attention of your supervisor, a higher-level manager, or a MultiCare resource such as the Confidential Message Line.

**Q:** *If I have been asked to speak at a conference and an honorarium is given to me for my effort, is that honorarium mine or does it belong to MultiCare?*

**A:** The right action is to seek a proper determination in advance of the speaking engagement. Generally, if you are being asked to speak in your role as an employee of MultiCare, and if your trip or other arrangements are sponsored by MultiCare, then the honorarium should be paid to MultiCare. If your speaking or consulting engagement is related to projects or initiatives at MultiCare, then all fees or honorariums should be paid to MultiCare. On the other hand, if your speaking engagement is unrelated to your employment or roles (past or present) with MultiCare, you are preparing and presenting without use of MultiCare resources, and you are using vacation or leave time to make the arrangements, prepare and give the presentation, then the honorarium is most likely your personal property. Since there is always judgment involved in such a situation, ask your administrative representative beforehand to determine who should receive the honorarium.

**Q:** *Is it appropriate to purchase stock in a company with which MultiCare does business?*

**A:** If you have influence over the purchase of goods or services from the vendor, you should avoid ownership of the stock of the vendor. This would most likely apply to management personnel and employees of the purchasing department.



**Q:** *My department is planning a celebration for National Department Week. Is it okay to call our vendors and ask them to contribute money for our department party?*

**A:** No. Only the Foundation should be soliciting money from our vendors. If the vendors offer to contribute “things”—such as food and giveaways, then that is fine. If they offer to contribute funds, they should be directed to the Foundation where a special purpose fund can be established for department use. But a department, with the authority to approve use of the vendor and the amounts of purchases, should not be soliciting from the vendors. This may appear to be pressure—if they don’t contribute, then we won’t purchase from them anymore, or a conflict of interest in that if they do contribute, they will get favored treatment.

## Improper Use of Funds

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**MultiCare funds may not be used for improper or illegal activities such as payments to physicians to “induce” referrals or for political payments.**

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MultiCare prohibits any payment that may be viewed as a bribe, kickback, or inducement. A “bribe” or “kickback” is any payment or consideration of value offered with the intent to influence a decision on grounds not directly related to its business merits. Payments or considerations of value given to physicians or other parties to influence the flow of referrals to MultiCare are inducements and are prohibited. Prohibited inducements include gifts of more than nominal value, excessive entertainment, or other considerations given to government employees, physicians, or any other party in a position to influence patient referrals. Gifts and gratuities given to physicians to influence the ordering of drugs or supplies are also prohibited.

You cannot use company funds to contribute to a political party, committee, organization, or candidate in connection with a political campaign. You may, of course, make personal contributions of your own funds to the campaigns of candidates of your own choice. Such contributions are not reimbursable by the company.

### Questions and Answers

**Q:** *What should I do if a physician asks me to provide payment or compensation in exchange for referrals to my facility?*

**A:** Such a request is against our principles and may be illegal. Discuss the situation with your supervisor, a higher-level manager, or another MultiCare resource such as the Confidential Message Line. Any supervisor or manager receiving this type of information should notify Legal Services.



**Q:** *I work in the payroll/accounts payable department and every month I process a check for a medical director. Recently I learned from a friend that the physician never performs services as a medical director. What should I do?*

**A:** When encountering questionable circumstances such as this, bring this information to the attention of your supervisor, a higher-level manager, or another MultiCare resource such as the Confidential Message Line.

**Q:** *As the tenant lease coordinator, I was asked to have a newly hired physician execute a lease in our medical office building. I noticed that the monthly payment was only \$5, which I judged to be substantially below fair market value. What should I do?*

**A:** When you discover what you think may be an unusual arrangement, bring this information to the attention of your supervisor, a higher-level manager, or another MultiCare resource. Improper inducements can come in many forms including below-market rent.

**Q:** *A co-worker borrowed cash from a till and said she would pay it back the next day. She did pay it back but is this an acceptable practice?*

**A:** No. All sites where cash is collected must maintain proper controls over the safeguarding of MHS assets. All employees have the responsibility to ensure that MHS assets are used for appropriate business purposes.

**Q:** *The physician I work for sees the family members of one of our drug reps and does not charge them for their visits. Is this right?*

**A:** No. The physician has a responsibility to avoid even the appearance of a conflict of interest. Since the drug rep has no familial relationship, the physician should document the services rendered and bill appropriately.

## Health, Safety and Environmental Concerns

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**Provide a safe and healthy workplace in which applicable health and safety laws and regulations are observed.**

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We constantly strive to find sound and innovative methods to reduce the impact of our activities on the environment. MultiCare policy is to comply with all applicable workplace health, safety, and environmental laws and regulations. MultiCare employees handle hazardous chemicals, infectious agents, medical waste and low-level radioactive materials at various locations. All employees are expected to handle materials according to established control, storage, and disposal procedures. If you do not know the correct procedure for handling or disposing of any material, promptly ask your supervisor or another MultiCare resource such as your Safety Officer for assistance.

## Questions and Answers

**Q:** *With all the rules and regulations about disposal of chemical waste, I am not entirely sure what I can pour down the drain. How can I find out what is acceptable?*

**A:** Most chemicals used in our facilities are not classified as hazardous waste. Information regarding the hazards, proper handling, and disposal of chemicals is contained in the Material Safety Data Sheet (MSDS) supplied to us by the manufacturer. These are located on the MHS Intranet MSDS Pro application or may be available in hardcopy in your departments where hazardous materials are used. If you are not sure, ask your supervisor or the Safety Officer before disposing of any chemical waste. MultiCare's Hazardous Waste Management Policies and Procedures provide additional guidance.

**Q:** *How does MultiCare dispose of medical /biohazardous waste?*

**A:** At the TGH-MBH campus, Environmental Services technicians steam sterilize all infectious waste (red bags) and some sharps so they are non-infectious before they leave the building. At Tacoma General, Mary Bridge, Good Samaritan, Allenmore Hospital, Covington and Gig Harbor Medical Park campuses, sharps are placed in reusable containers that are collected once or twice per week depending on use, and shipped off-site to the Biosystems processing plant for disposal. At all other sites, MHS contracts with a licensed infectious waste disposal company to pick-up and process infectious waste and sharps.

At the Good Samaritan campus, Environmental Services technicians collect all infectious waste (red bags) and some sharps and remove them to containers near the loading dock for disposal by a licensed waste disposal company. Sharps are placed in reusable containers that are collected once or twice per week depending on use, and shipped off-site to the Biosystems processing plant for disposal.



## Protecting MultiCare Assets

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### **Use company property and other MultiCare assets for business purposes only.**

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Company property is made available to MultiCare employees for authorized MultiCare business purposes only and should not be used for personal reasons. This applies to physical assets such as office equipment, computers, fleet vehicles, software and supplies or medical supplies, as well as other types of property such as company records, patient information, and customer lists. Company property must not be removed from company premises, unless it is necessary to do so to perform your job. If removed from company premises, you must return the property to the company as soon as it is no longer needed off-site for business purposes.

All MultiCare employees are expected to maintain and properly care for company property.

### Questions and Answers

**Q:** *If I see an employee intentionally misusing/ damaging company property, what should I do?*

**A:** We all have an obligation to treat company property and equipment with care and respect. This includes reporting any damage or malfunction of company property to appropriate company personnel. If you are aware of anyone intentionally or negligently damaging MultiCare property or equipment, report your observations to your supervisor or other company manager, who will investigate the matter and take appropriate action.

**Q:** *I was told by a MultiCare employee that I could supply a list of our clients to any outside source. Is this true?*

**A:** Client lists are a valuable asset and should never be disclosed to anyone outside of the company without specific management approval. Ask your supervisor about any request you receive for such a client list.

**Q:** *I am taking a continuing education class and MultiCare is reimbursing me for the tuition, since the course is designed to improve my job related skills. May I use my portable computer from work to do that homework?*

**A:** Yes, under some narrow circumstances, your use of the company property is related to your employment with MultiCare. Work with your supervisor to make sure that the equipment is not needed for company business during the time you are using it for schoolwork. Never assume you may use or remove company property until you have obtained clear approval in advance from your supervisor.

**Q:** *I have a co-worker who uses the internet at work a lot. This affects my work as I need information that my co-worker should be providing to me. My supervisor thinks it is my fault. I don't want to get my co-worker in trouble, but I don't want to get blamed either. What should I do?*

**A:** Tell your supervisor that you think your co-worker is using the internet excessively. This can be readily investigated. While the internet is available to most MultiCare employees, time spent at work should not be used for personal use. Incidental use (on breaks and lunches) is fine; informing your supervisor of this will help alleviate concerns about excessive use.



# Acknowledgement of Standards for Business Conduct Handbook

My signature on this form acknowledges that I have received and read the MultiCare Standards for Business Conduct Handbook.

I agree to comply fully with the standards contained in this book. I understand that compliance with these standards, policies, and procedures is a condition of my continued employment or association with MultiCare. I also understand that MultiCare reserves the right to occasionally amend, modify, and update the Standards for Business Conduct Handbook and principles contained in the Handbook.

I also acknowledge that the Handbook is only a statement of principles for individual and business conduct and does not, in any way, constitute an employment contract or an assurance of continued employment.

\_\_\_\_\_

NAME

\_\_\_\_\_

SIGNATURE

DATE

\_\_\_\_\_

DEPARTMENT/FACILITY

EMPLOYEE NUMBER

EHR: 01/08

**Signed acknowledgement due within 90 days to Human Resources along with your NEO checklist.**

**If you need any help understanding these standards, please talk with your supervisor.**



Do all the good you can,  
by all the means you can, in all the ways you can,  
in all the places you can, at all the times you can,  
to all the people you can, as long as you can.

JOHN WESLEY

If you are going to achieve excellence in big things,  
you develop the habit in little matters.  
Excellence is not an exception,  
it is a prevailing attitude.

COLIN POWELL