Dear Team Members,

Our mission is "Partnering for Healing and a Healthy Future." We exist to meet the needs of our communities and serve our patients and their families by providing high-quality, safe, compassionate, high value services, and ethical patient care in each and every encounter, visit, admission, call, education session, community event, and more. We fulfill our mission in numerous settings and in collaboration with our many partners, including our vendors, community providers, volunteers, students, employers, insurers and others.

This handbook is intended as a resource. It provides guidelines and direction on how we will act as we fulfill our mission. Our standards are aligned with our shared values. It is expected that all of us who represent MultiCare do so with our mission, vision, and values in mind. As a not-for-profit organization, we must be good stewards of the health of our community, of our organization’s assets (community assets), and of our reputation. We need a solid, trusting relationship within our organization, with our partners and with our community. Our Standards for Business Conduct outline how we work hard, every day, to ensure that everything we do is done with integrity and in a manner consistent with high ethical standards.

We are a human organization and at times we do not effectively live up to our expectations. If and when this happens, the mechanisms for reporting are clearly outlined. We rely on the integrity and honesty of all of us as individuals and as a team – employees, providers, and others – to deliver on our value of integrity.

There are times when people need to access a confidential resource. To help provide this resource, we have a confidential compliance hotline and e-mail. We encourage those with questions and concerns to ask. We have system experts in Human Resources, Legal, Quality, Privacy, Security and more. Please do not hesitate to ask questions. We work in a complex environment and being willing to ask questions is essential to doing good.

Retaliation must not be a part of our organization’s culture, and you will not be retaliated against for asking questions or raising concerns. Questions are a gift; an opportunity for us to 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 are governed by a community Board of Directors. The Board provides oversight and direction for our mission, vision, values, strategies, care, quality, operations, finances, and compliance efforts. We work in a very complex and rapidly changing ecosystem and are subject to many regulatory requirements. We work hard to always comply with the laws, rules, and regulations that are applicable to our organization and seek to educate, to audit, and to report on our efforts.

Thank you for supporting MultiCare’s ethical standards. We appreciate all your efforts.

William G. “Bill” Robertson
President and CEO
MultiCare Health System
The MultiCare Standards for Business Conduct are aligned with our shared values. Examples of frequently asked questions are included after the standards statements.

### Table of Contents

<table>
<thead>
<tr>
<th>Section</th>
<th>Page</th>
</tr>
</thead>
<tbody>
<tr>
<td>A Message from Bill Robertson</td>
<td>1</td>
</tr>
<tr>
<td>Code of Conduct: Overview</td>
<td>3</td>
</tr>
<tr>
<td>Our Mission, Vision, and Values</td>
<td>4</td>
</tr>
<tr>
<td>Business Ethics &amp; Reporting of Concerns</td>
<td>5</td>
</tr>
<tr>
<td>Reporting Process</td>
<td></td>
</tr>
<tr>
<td>Non-Retaliation Policy</td>
<td></td>
</tr>
<tr>
<td>Confidential Compliance Hotline</td>
<td></td>
</tr>
<tr>
<td>Respect</td>
<td>7</td>
</tr>
<tr>
<td>Fair Treatment of Employees</td>
<td></td>
</tr>
<tr>
<td>Substance Abuse</td>
<td></td>
</tr>
<tr>
<td>Workplace Violence</td>
<td></td>
</tr>
<tr>
<td>Marketing</td>
<td></td>
</tr>
<tr>
<td>Integrity</td>
<td>9</td>
</tr>
<tr>
<td>Disciplinary Measures</td>
<td></td>
</tr>
<tr>
<td>Ethical Business Practices</td>
<td></td>
</tr>
<tr>
<td>Conflicts of Interest</td>
<td></td>
</tr>
<tr>
<td>Stewardship</td>
<td>11</td>
</tr>
<tr>
<td>Billing Practices</td>
<td></td>
</tr>
<tr>
<td>Fraud and Abuse</td>
<td></td>
</tr>
<tr>
<td>Special Legal Responsibilities</td>
<td></td>
</tr>
<tr>
<td>Improper Use of Funds</td>
<td></td>
</tr>
<tr>
<td>Confidentiality of Information</td>
<td></td>
</tr>
<tr>
<td>Protecting MultiCare’s Assets</td>
<td></td>
</tr>
<tr>
<td>Excellence</td>
<td>14</td>
</tr>
<tr>
<td>Patient Care</td>
<td></td>
</tr>
<tr>
<td>Accuracy of Records</td>
<td></td>
</tr>
<tr>
<td>Collaboration</td>
<td>15</td>
</tr>
<tr>
<td>Patient Rights</td>
<td></td>
</tr>
<tr>
<td>HIPAA Privacy and Security</td>
<td></td>
</tr>
<tr>
<td>Government Investigations</td>
<td></td>
</tr>
<tr>
<td>Health, Safety and Environmental Concerns</td>
<td></td>
</tr>
<tr>
<td>Kindness</td>
<td>17</td>
</tr>
<tr>
<td>Questions and Answers</td>
<td>18</td>
</tr>
</tbody>
</table>
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.*
Our Mission: Partnering for Healing and a Healthy Future

Our Vision: MultiCare will be the Pacific Northwest’s highest value system of health:

• Leading as a people-centric community asset
• Integrating a full continuum of high-performance, customer-focused health and health related solutions
• Delivering world class health outcomes and exceptional experience at a competitive price

Our Values: • Respect
  • Integrity
  • Stewardship
  • Excellence
  • Collaboration
  • Kindness
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 and with MultiCare values and principles? How would you feel if you did it? How would it look to family, friends, patients and the community?
   - If you know it is wrong, don’t do it.

2. **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.

3. **It is MultiCare policy to ensure that no employee is penalized for raising a legitimate issue or concern.**

3. **Follow the 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 Compliance Office, or go to the next step.
   - Call the MultiCare Confidential Compliance Hotline at at 866.264.6121.

Who Can I Go To?
- Your immediate supervisor, or
- A higher-level manager, or
- Human Resources, Legal Services, Quality Management or other appropriate department, or
- Anyone in the Compliance Department, or
- The Confidential Compliance Hotline
  866.264.6121

Why Focus on the Value of RESPECT?
In our mission to create safe places for everyone to work and receive care, it is our core value of RESPECT that is the most persistent reminder that discrimination and inappropriate behavior—in word and deed—are never acceptable.

*Together, We Serve, We Inspire, We Thrive*
A simple, bold declaration:

Harassment and discrimination are not tolerated at MultiCare, and our organization is committed to a diverse workforce.

“Wisdom is knowing the right path to take. Integrity is taking it.”

M.H. McKee
– American rancher

No caller will be subject to retaliation or reprisal for expressing a concern or asking a question in good faith.

The Confidential Compliance Hotline 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 Compliance Hotline can be contacted 7 days a week. Calls to the Confidential Compliance Hotline are received in a secure voicemail system and retrieved by designated personnel in the Compliance Department. Messages will be returned during normal business hours by a compliance department staff member under the direction of the Compliance Officer. The Compliance Office will initiate an investigation of appropriate matters reported to the Confidential Compliance Hotline that cannot be otherwise resolved. Sometimes a call or question may need to be referred to another department for input or follow-up.

Questions Or Concerns?

Ask your resources:

• Chain of command
• Call the Confidential Compliance Hotline at 866.264.6121.
• Online Portal:
  ➢ MHSNet
  ➢ Compliance and Ethics
  ➢ Confidential Compliance Hotline

No caller will be subject to retaliation or reprisal for expressing a concern or asking a question in good faith.

The MultiCare Confidential Compliance Hotline is available to all members of the MultiCare community. Anyone—employee, physician, vendor, volunteer or patient—may call the Confidential Compliance Hotline to ask questions concerning ethical or legal conduct, to report any potentially improper action, and to report HIPAA privacy issues. All reports are confidential and the staff of the Confidential Compliance Hotline will address all reasonable questions and concerns.

MultiCare Standards for Business Conduct

Phone: 866.264.6121

The MultiCare Confidential Compliance Hotline is available to all members of the MultiCare community. Anyone—employee, physician, vendor, volunteer or patient—may call the Confidential Compliance Hotline to ask questions concerning ethical or legal conduct, to report any potentially improper action, and to report HIPAA privacy issues. All reports are confidential and the staff of the Confidential Compliance Hotline will address all reasonable questions and concerns.
Respect

MultiCare’s shared value of respect is reflected in how we treat each other. We affirm the dignity of each person and treat each individual with care and compassion.

Respect: 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; color; religion; national origin; age; sensory, mental or physical disability; marital status; veteran’s status; gender; gender identity; sexual orientation; or any other illegal basis at the federal, state or local level.

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 Compliance Hotline.

Respect: Substance Abuse

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

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. We will not put our patients or our colleagues at risk due to abusive behaviors.

Controlled substances are monitored on a daily, weekly and monthly basis by means of system reporting. In addition, policies are in place to provide guidance on managing controlled substances. Drug diversion is taken seriously by MultiCare management.

It is prohibited under MultiCare policy to be under the influence of alcohol, marijuana or other unauthorized controlled substances while at work, including prescribed substances that may cause impairment. This includes all providers of care, employees, volunteers and contractors. MultiCare has an employee assistance program to support employees as needed.
Respect: Workplace Violence

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

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 workplace violence. MultiCare addresses workplace violence prevention by providing ongoing mandatory education for employees and requiring all MultiCare employees to wear badges for identification. Each employee has a responsibility to be alert for suspicious activity and report it to their leadership or security, to follow security protocols and maintain our facility security, and to alert leadership of any security threats. The Security department can provide departmental education as needed.

Disruptive behavior, by anyone—employees, physicians, contractors, agency, vendors, visitors, patients—is prohibited and should be reported immediately to your supervisor or Security. The Security department is on call to help address these situations.

Respect: Marketing

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

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. We respect that our competitors too are working diligently to provide high-quality health care services to our community.
- Advertising should not exploit customer or patient fears as a key motivating factor.

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.
Integrity
Our integrity is evidenced by how we act in all our business relationships and in our avoidance of conflicts of interest. We speak and act honestly to build trust.

Integrity: Disciplinary Measures

Every employee has a duty to report issues and concerns.

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 available on the MultiCare intranet, under Policies. We have both a Human Resource policy as well as a policy which specifically addresses Compliance related issues.

MultiCare encourages the reporting of issues and concerns related to 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 up to and including possible termination.

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

Integrity: Ethical Business Practices

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

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.
Integrity: Conflicts of Interest

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

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.

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, except within the limits described below and by policy. 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 (less than $100) extended as business courtesy, such as sales promotion items or occasional business-related meals or entertainment of modest value. This is also defined in our Gifts and Gratuities policy available on the MultiCare intranet.

In no case may a MultiCare employee accept a gift or consideration of more than $100. 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. We encourage staff to direct patient recognition gifts to our Foundations.

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.

Managers and staff of MultiCare may participate in vendor-sponsored travel to preview equipment, systems installations or other demonstrations. Any vendor sponsored travel 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.

As a representative of MultiCare, we must all act with integrity in conducting MultiCare business in a manner that does not put our ethics to question. Avoiding conflicts of interest is an important way to ensure that our business relationships are free from even the perception of self-benefit or promotion.
Stewardship

We have a responsibility to manage our assets effectively to ensure that we can continue to provide services in our community for years to come.

We develop, use and preserve our resources for the benefit of our customers and community.

Stewardship: Billing Practices

Ensure that bills are accurate and honest at all times.

MultiCare bills only for services actually rendered. Services rendered must be accurately and completely coded to ensure 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 which 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 charging 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 Revenue Integrity 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 Compliance Hotline if the issue remains a concern.
Stewardship: Fraud and Abuse

As stewards of the Medicare and Medicaid trust funds we must ensure that our billings accurately reflect services rendered.

As an organization with high ethical standards, we must 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 issues and concerns in good faith. All employees, patients, physicians, and vendors also have the right to report mis-billings to the government at any time. MultiCare has policies which describe our responsibilities under the federal Fraud and Abuse statutes.

Stewardship: Special Legal Responsibilities

Antitrust - 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 or divide geographic markets. You should not, for instance, share pricing or other confidential information with a competitor. 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. All joint ventures and alliances must be reviewed and approved by Legal Services.

Inside information

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 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 stock, bond or option) when you have questions about information you have learned at MultiCare and whether it might violate insider-trading laws. Also, 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.

Fraud also includes theft - supplies, equipment, time (timecard fraud) and more. Report fraud if you see it.
Stewardship: Improper Use of Funds

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

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 consideration of value given to physicians or other parties to influence the flow of referrals to MultiCare are inducements and are prohibited. Prohibited inducements can include gifts, entertainment, or other consideration 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.

Stewardship: Confidentiality of Information

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.

Never disclose confidential patient information to any unauthorized person. MultiCare 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 for legitimate MultiCare business purposes.

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. MultiCare subscribes to Copyright Clearance Center. All employees can access this site to view copyright status and privileges. Contact the Corporate Compliance Department for more information about utilizing Copyright Clearance Center.

Stewardship: Protecting MultiCare Assets

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

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.
Excellence

We achieve excellence through the provision of safe, high quality care, stellar customer service, positive financial results, and creation of an ethical culture.

We hold ourselves accountable to excel in quality of care, personal competence and operational performance.

Excellence: Patient Care

Compassionately deliver safe, appropriate, effective, quality care to our patients.

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 the patient and family stress, anxiety and fear. Patients and families 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.

We all have a role and responsibility to ensure patient safety and quality of care/services provided to our patients, their families and our community.

Excellence: Accuracy of Records

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

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. MultiCare is committed to compliance with legal requirements for all state and federal filings including Medicare cost reports and tax, licensure and similar filings.

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

We collaborate with each other, with our patients and families, and with our partners in our community to provide high quality services in an ethical manner.

We work together recognizing that the power of our combined efforts will exceed what we can accomplish individually.

Collaboration: Patient Rights

MultiCare respects the rights of patients.

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.

We collaborate with our patients and their families to protect all the rights to which our patients and staff are entitled—privacy, advocacy, safety, and more. These are presented in our Patient Information brochure which is available to all our patients and staff.

Our patients also have the right to be treated fairly. MultiCare does not discriminate on the basis of race, color, creed, religion, gender, age, disability status, national origin, sexual orientation, marital status, gender identity, genetic information or any other illegal basis.

Alone we are smart. Together we are brilliant.

- Steven Anderson - Educator
**Collaboration: HIPAA Privacy and Security**

**MultiCare keeps patient information confidential and secure.**

MultiCare is dedicated to protecting our patients’ right to privacy and the security of the patient, employee and community data that is entrusted to MHS. Through the creation of the MultiCare Privacy Office, MultiCare takes a proactive approach to ensure compliance with HIPAA (Health Insurance Portability and Accountability Act of 1996) and Washington State Law. The MultiCare Information Security Office takes a proactive approach to compliance with the HIPAA Security Standard, Washington State Law and nearly 30 other regulatory requirements that MultiCare must abide by.

It is the responsibility of all MultiCare staff and business associates to protect our patient’s privacy and to help prevent all inappropriate access and disclosures of patient information.

It is MultiCare policy that we limit our access of the medical record to the minimum necessary and only access patient information for which we have a job-related business need-to-know. It is also our policy that we do not access our own medical records or those of co-workers, friends or our family members. As a patient, you have a right to your health information, however you must access this information through the proper channels such as the Health Information Management (medical records) department or by using MyChart on multicare.org.

It is important to be aware of our surroundings when discussing patient care. Public areas such as the cafeteria or elevators are not appropriate locations to discuss patient information even if you are not using the patient’s name.

Through the normal course of our day-to-day jobs we come across a lot of information. Some of it may be about someone we know and it is our responsibility as MultiCare staff to maintain the confidentiality of our patients’ information and not disclose it inappropriately.

We must also ensure that patient information in our computer systems is secure. We do this by logging off or locking our computer when not in use, using screen protectors effectively, by locking doors, creating and using complex passwords, not sharing passwords, keeping secure access areas free from unauthorized persons, not leaving portable MHS equipment such as laptops and mobile devices unattended in unsecure areas including vehicles, and not opening emails or files that appear to be suspicious or from unknown senders. Inappropriate and/or excessive use of social media sites such as Facebook on work computers or on work time is not acceptable. Our policy states it can be used on an incidental basis only, if approved by your supervisor or manager. Examples of inappropriate use would include posting any patient information online, texting patient information, or posting patient photos.

All staff must comply with the MultiCare Privacy and Security policies. This is for the safety and security of our patients as well as our staff.

---

**Collaboration: 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, including emails or any other electronic documents, 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.

Collaboration with government investigations is important. We are all working toward the same goal—efficient use of tax dollars for the provision of care to our community. We are all doing our best to ensure compliance with laws, rules and regulations. Working collaboratively with government agencies in a respectful and kind manner is how we at MultiCare exhibit our shared values.
Collaboration: Health, Safety and Environmental Concerns

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

We constantly strive to find sound and innovative methods to reduce the impact of our activities on the environment. We are committed to protecting the environment through innovative buildings and recycling practices. 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.

We need effective collaboration to ensure staff and patient safety and to minimize the impact of waste on our environment.

Coming together is a beginning; keeping together is progress; working together is success.

Henry Ford – American Industrialist

Kindness

We are kind to all in our care and business relationships. Kindness matters. We always treat everyone we come into contact with as we would want to be treated.
Questions and Answers

The following Q&A is intended to provide examples of the types of questions and answers that employees, physicians, vendors, volunteers and others might ask about our standards. This is not a comprehensive list. Please ask if you have questions.

RESPECT: FAIR TREATMENT OF EMPLOYEES

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) department at 253-403-MYHP (6947). 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?

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: 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. You may choose 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 Compliance Hotline. 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, Legal Services or a higher level MultiCare resource.
**Q:** I am a manager and my staff informed me of culturally insensitive remarks made by another employee about a co-worker or patient. What should I do?

**A:** Advise the offending employee that his or her choice of language is unacceptable and will not be tolerated at MultiCare. If the behavior continues, then the manager should consult with a Human Resources representative. The manager should also contact the Center for Health Equity at 253-403-1480 for a consult or to request cultural competency training and related resources to mitigate this behavior.

**RESPECT:**

**SUBSTANCE ABUSE**

**Q:** I think one of my co-workers 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. Keep the concerns confidential as we must also respect the reputation of the employee.

**RESPECT:**

**WORKPLACE VIOLENCE**

**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 to your car. We provide this service to our employees for their protection.

**Q:** I have been taking care of a patient who has been very rude, he has called me names and thrown things at me when he doesn’t get what he wants. What should I do?

**A:** Notify your supervisor of the patient’s behavior. You can also call security to notify them of the inappropriate behavior. We are here to provide a safe environment for our patients while also providing a safe environment for the employee. Patients are not allowed to be disrespectful or violent.

**RESPECT:**

**MARKETING**

**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. We do not disparage competitors in our advertising.

**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 the 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 the 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.

INTEGRITY: DISCIPLINARY MEASURES

Q: I witnessed an incident and was interviewed by my management and HR. They asked why I did not report this issue. I was fearful of retaliation. Now I am being disciplined for not reporting. What should I do now?

A: You have a duty to report issues and concerns. It is how we keep MultiCare ethical, safe, and a great place to work. By not reporting, you potentially put yourself, co-workers or patients at risk. This is a learning opportunity for you. Talk candidly to your manager and to HR about the incident and your concerns. Together, you should be able to learn from this incident.

INTEGRITY: ETHICAL BUSINESS PRACTICES

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, you can approach a more senior manager. Other resources that may be used are MultiCare Legal Services, Human Resources, and the Compliance Office. The Confidential Compliance Hotline 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, who 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. We need to act with integrity. Use the MultiCare reporting process. If possible, start with your supervisor and explain the issue to her or him.

If the issue cannot be 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 Compliance Hotline.
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.

INTEGRITY: CONFLICTS OF INTEREST

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. Nor 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: 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, common sense, and MultiCare policy. 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 (MultiCare gift value limit is $100). The event must be hosted by the vendor; it is not acceptable to just accept tickets as a gift or gratuity.

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 Compliance Hotline.

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. Honoraria can be directed to a fund of your choice at one of the Foundations.

MultiCare Standards for Business Conduct

21
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 it might be fine depending on the situation. 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 receive favored treatment. If in doubt, call the Corporate Compliance department for input.

STEWARDSHIP: BILLING PRACTICES

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.” 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: Patients sometimes call physicians and ask them to change their medical coding (either CPT or ICD-10) 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. We can also refer patients in need to our Financial Assistance program.

Q: The supervisor of my 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 their explanation or you don’t feel comfortable approaching them on this issue, contact their supervisor. Keep asking questions until you get an answer that makes sense to you. Many MultiCare resources are available to you, including the Confidential Compliance Hotline.

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 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 Compliance Hotline. 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.
**STEWARDSHIP: FRAUD AND ABUSE**

**Q:** What is the difference between Fraud and Abuse?

**A:** Fraud is the intentional deception or misrepresentation that someone makes, knowing it is false. Abuse is lack of knowledge of laws or regulations, disregard, or conduct that goes against or is inconsistent with accepted medical, business, or fiscal practices. If you suspect instances of either fraud or abuse you should report your concerns to Corporate Compliance through the Confidential Compliance Hotline. You can also reference the policy on Fraud and Abuse on the MultiCare intranet. Medicare and Medicaid have specific requirements for reporting fraud and abuse. We are responsible for being good stewards of government funds.

**STEWARDSHIP: SPECIAL LEGAL RESPONSIBILITIES**

**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:** Absolutely not. 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.

**STEWARDSHIP: IMPROPER USE OF FUNDS**

**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 is likely unlawful. Discuss the situation with your supervisor, a higher-level manager, or another MultiCare resource such as the Confidential Compliance Hotline. 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 Compliance Hotline.

**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 MultiCare assets. All employees have the responsibility to ensure that MultiCare assets are used for appropriate business purposes. This must be reported to your supervisor.

**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. The physician should document the services rendered and bill appropriately.

**STEWARDSHIP: CONFIDENTIALITY OF INFORMATION**

**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, Human Resources and Finance who need access to these records. You may also review your personnel records.
Q: Our department/clinic occasionally receives calls from patients wanting copies of their medical records. Can we provide this information?

A: 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 Health Information Management (medical records) Supervisor before releasing any medical record information. We must validate the identity of patients and representatives to ensure information is only released to authorized persons.

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: At my old job we used this other software that uses the cloud and it really helped. Can I download it?

A: Downloading unapproved software is a violation of the Information Security Policies and can put MultiCare at risk for viruses, data disclosure, fines and penalties. If you know of software or services that you believe can create efficiencies or improve processes please contact Information Services and they will perform a systems review to ensure this software or service complies with our policies and doesn’t put MultiCare at risk.

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.

**STEWARDSHIP: PROTECTING MULTICARE ASSETS**

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. We are all stewards of MultiCare assets.

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. Patient privacy rights may also apply. 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. Keep in mind that unless the training is mandatory you must do your schoolwork on your own time, not on company time.

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.

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.

Q: My role at MultiCare doesn’t involve direct contact with patients, so I don’t need to use AIDET, right?

A: All employees at MultiCare are expected to use AIDET (Acknowledge, Introduce, Duration, Explain, Thank) as the communication framework for all interactions. Some examples are: helping visitors who might become lost in the hallway, the opening of a meeting or a presentation, providing communication between departments as well as confirming assignments/handoffs with colleagues, etc.

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 should 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 Compliance Hotline.

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 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.

COLLABORATION: PATIENT RIGHTS
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 Experience line at 866.247.2366 or write to us at Grievances, MultiCare Health System, Attn: Patient Advocacy, mailstop 419-2-CN, PO Box 5299, Tacoma, WA 98415-5299 or email us at Patient.Advocacy@multicare.org.

Additional contact information for the Patient Advocacy team:
Good Samaritan Hospital:
253.697.1950 or 866.247.2366
401 15th Avenue SE, Puyallup, WA 98372

Allenmore Hospital:
253.459.6122 or 866.247.2366
1901 South Union Avenue, Tacoma, WA 98405

MultiCare Auburn Medical Center:
253.545.2286 or 866.247.2366
202 North Division Street, Auburn, WA 98001

MultiCare Covington Medical Center:
253.545.2286 or 866.247.2366
17700 SE 272nd St, Covington, WA 98042

Mary Bridge Children’s Hospital and Health Network:
253.545.2286 or 866.247.2366
311 South L Street, Tacoma, WA 98405

Tacoma General Hospital:
253.403.2916 or 866.247.2366
315 Martin Luther King, Jr. Way, Tacoma, WA 98405

MultiCare Deaconess Hospital:
866.247.2366
800 W. 5th Avenue, Spokane, WA 99204

MultiCare Valley Hospital:
509.473.5894
12606 East Mission Ave. Spokane Valley, WA 99216

Rockwood Clinic:
509.342.373
400 E. 5th Ave, Spokane, WA 99202

Q: I observed an employee use LEARN (Listen, Empathize, Apologize, Respond, Nurture with a thank you) with a patient who was given the wrong day for an appointment and had to return the next day. The patient was given 2 gas cards worth $5 each. Is it okay to give more than one card for service recovery?

A: Depending on the severity of the issue, the employee involved can use their own discretion to determine the amount of a token gift. Typically the gift cards are used for minor inconveniences. In this case, the employee is authorized to give 2 cards. In fact all employees are authorized to give up to $20 value for service recovery. For a moderate or severe issue, connect with your supervisor or call the concern line at 866.247.2366 or 253.403.2184 for additional support on the best way to respond to the service issue.

COLLABORATION: HIPAA PRIVACY AND SECURITY
Q: I have witnessed one of my co-workers accessing the medical records of a co-worker. What should I do?

A: It is our duty to report incidents such as these. You can report to your supervisor, submit an incident to the Incident Reporting System, or call the Privacy Office. These incidents can also be reported through the Confidential Compliance Hotline.

Q: I overheard two nurses at the nurse station gossiping in loud voices about one of the patients on the floor. What should I do?

A: This is inappropriate behavior and violates our patient’s right to privacy. If you feel comfortable you can tell the nurses you feel their conversation is inappropriate and ask them to stop. If you do not feel comfortable speaking to them directly, you should report your concerns to your supervisor.
Q: I accidentally faxed patient information to the wrong fax number. What should I do?
A: In this case, you will need to contact the Privacy Office. They will request that the unintended recipient of the information return the Protected Health Information to MultiCare or obtain confirmation from the recipient that the PHI has been appropriately disposed of. A description of what PHI was inappropriately disclosed and to whom the fax was sent is required so that the Privacy Office can respond as required under the HIPAA privacy laws. We have responsibilities under the HITECH Act to report breaches of patient information.

Q: We have shared printers in our department. My co-worker accidently took my patient’s printed discharge instructions and gave them to her patient. What should I do?
A: Ensure that your patient receives his/her discharge instructions so their care is managed after discharge. Ask the patient who received the wrong documents to return them to you if possible. Submit an incident to Privacy Office under the patient whose information was given out incorrectly. The Privacy Office will contact you if additional information is needed.

Q: I saw a provider give their password to their Medical Assistant to enter a patient’s order. What should I do?
A: This violates our Information Security policy. Report this to your supervisor, to the IS service desk and to the Privacy Office.

Q: I have heard that the black bin waste containers are very expensive to dispose of because of the special rules around hazardous waste. I see my co-workers throwing general trash and non-hazardous materials into those containers, what should I do?
A: We all have a responsibility to reduce costs and waste. However the federal and state laws surrounding disposal of hazardous waste are very expensive to comply with. The black bin waste containers are transported to special facilities for incineration and we are charged a much higher fee per pound to dispose of this waste as compared to normal waste. For every non-hazardous waste item that is disposed of in this black bin, it dramatically drives up the cost of disposal. If you see someone depositing non-hazardous material in a black bin, remind them of the rule, or advise your manager. If you have any questions please review the MultiCare hazardous waste policy.

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 Safety Data Sheet (SDS) supplied to us by the manufacturer. These are located on the MultiCare Intranet SDS Pro application. 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.

Other types of waste require special handling and disposal procedures. If you have any questions about waste disposal, contact your supervisor or the safety officer.

Q: How does MultiCare dispose of medical/biohazardous waste?
A: Infectious waste (red bags) is steam sterilized by MultiCare Environmental Services technicians at the MB/TG and GSH campuses. All other MultiCare sites utilize a licensed infectious waste disposal company to pick-up the waste and process it off-site. All infectious waste is processed so that it is non-infectious before being disposed of in a solid waste landfill. Biohazardous only sharps are placed in disposable sharps containers before being processed. MultiCare contracts with a licensed infectious waste disposal company to process and dispose of sharps off-site.

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.

COLLABORATION: GOVERNMENT INVESTIGATION

Q: How can I find out what is acceptable?
A: We all have a responsibility to reduce costs and waste. However the federal and state laws surrounding disposal of hazardous waste are very expensive to comply with. The black bin waste containers are transported to special facilities for incineration and we are charged a much higher fee per pound to dispose of this waste as compared to normal waste. For every non-hazardous waste item that is disposed of in this black bin, it dramatically drives up the cost of disposal. If you see someone depositing non-hazardous material in a black bin, remind them of the rule, or advise your manager. If you have any questions please review the MultiCare hazardous waste policy.

MHS is also replacing the biohazardous only reusable sharps containers with a new “dual waste” sharps container process that can accept infectious sharps and pharmaceutical waste that will be incinerated as the black pharmaceutical waste containers. The cost of non-sharps/pharmaceutical wastes in these containers drives a very costly waste stream. The black bins in the clinic settings will also be replaced with a cheaper waste incineration at a municipal waste incineration instead of the more costly black bin disposal.
Live so that when your children think of fairness and integrity, they think of you.

H. Jackson Brown, Jr.
Author