



Code of Conduct

A Dedication to Integrity

PeaceHealth Clinically Integrated Network (CIN) is committed to being a highly ethical organization that continually strives to arrange for the highest quality of care for the patients we serve. This Code of Conduct and the policies and procedures adopted by the CIN help us establish our expectations for how the CIN and our partners will conduct matters with one another and toward our patients to ensure we all do the right thing.

The standards outlined here do not represent an exhaustive list but provide the foundations of our desire and responsibility to support the care and service of our patients, families, and one another.

Mutual Respect

We will strive to conduct our relationships with one another with honesty, mutual respect, openness, and collaboration. We do not tolerate violence, harassment, or unlawful conduct. We welcome diversity of backgrounds and ideas, and prohibit discrimination based on any protected class, including:

- Gender, sex, gender identity or gender expression
- Race, color, ethnicity or national origin
- Religion
- Disability
- Genetic information
- Age
- Sexual orientation
- Marital status
- Veteran status

Patient Privacy

The CIN is committed to protecting our patients' protected health information (PHI) by adhering to all laws governing our relationships with patients and their data, electronic, written, oral or otherwise.

We all play a key role in protecting patient privacy, and are committed to:

- Only accessing, using, and/or disclosing a patient's PHI when necessary in performing job-related functions.
- Protecting private information from being viewed by unauthorized persons.
- Disposing of sensitive documents, including PHI, in a secure method, such as in specially marked bins or shredders.
- Refraining from discussing private information in public areas where it may be overheard.

Reporting and Non-Retaliation

Retaliation occurs when an employer punishes an employee for reporting a concern about conduct that they believe in good faith could violate our policies or the law.

The CIN does not tolerate retaliation against those who report a concern in good faith. We support everyone to raise good faith concerns or make reports regarding violations of our policies or the regulations we are bound by as required by federal and state laws. The CIN will take disciplinary action for any violations of our Code of Conduct.

Stewardship

The CIN participants must examine all relationships and arrangements with referral sources, providers, and vendors to be certain there are no kickbacks or illegal incentives. We are responsible for and adhere to all relevant laws that place limits on patient referrals, including The Anti-Kickback Statute, Stark Law, The False Claims Act, and The Patient Inducement Prohibition.

Furthermore, all CIN participants are responsible to prevent Fraud, Waste and Abuse in accordance with relevant federal and state laws. Anyone may report suspected violations using the resources on the following page and may report anonymously when reporting through the CIN's Integrity Hotline or Organizational Integrity Department.

Conflicts of Interest

We encourage ethical partnerships with our peers in support of our goal to provide the highest-quality care to our communities. We must be particularly diligent when considering if we may be involved in an actual or perceived conflict of interest (COI), or when accepting or giving personal gifts, and follow all related policies.

All CIN-affiliated providers must ensure that any personal gifts, whether from patients or vendors, are lawful and appropriate. We must explicitly avoid gifts of cash and cash equivalents, requests of gifts, or rewards for patient referrals.

Resources

A “Speak-Up” Culture

Our Vision calls on us to promote the safety and well-being of our patients and colleagues. We must always be careful to use safe and sound procedures and report any issues that may compromise safety.

Ensuring safety is everyone’s job and requires a “speak-up” culture.

The CIN has the opportunity to improve every time you ask a question or raise a concern. When you speak up to clarify a policy or report questionable conduct, you are protecting your coworkers, patients, and the reputation of the CIN.

Integrity Hotline

Report compliance questions or concerns through the Integrity Hotline:

- Online at peacehealth.alertline.com, or,
- Via phone at 877-606-1756

Organizational Integrity

To reach the PeaceHealth OI Department, which administers the CIN’s compliance program, please leave a message at 360-729-1730, or email us at any of the following address depending on the nature of your question:

- Hospital or clinical compliance or processes
rssc-OIHealthcareCompliance@peacehealth.org
- Conflicts of interest, gifts and giving, or exclusions:
OI-COIQuestions@peacehealth.org
- Compliance education and training:
OI-HealthcareComplianceEducation@peacehealth.org

