

CODE OF ETHICS



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This Code of Ethics booklet provides a broad overview of key responsibilities of Intermountain’s workforce. For more in-depth information, please refer to Intermountain’s Policy Library. In addition, you may speak to your immediate supervisor or call the Compliance Hotline at (800) 442-4845 for more help with specific issues.



Every day patients, members, and their families come to us in times of need, trusting that we will give them our very best medical care and service.

We are committed to honoring their trust by providing excellent clinical care and superior service with the highest standards of integrity.

This commitment applies to every aspect of our work, and is fundamental to our mission, vision, and values.

Although we each have different roles and responsibilities, and we work in a complex and ever-changing healthcare and regulatory environment, we all abide by our high standards because it is the right thing to do. We expect every employee, clinician, trustee, vendor, contractor, and

volunteer who is a part of our organization to understand and follow the rules and requirements that apply to their work.

This Code of Ethics booklet outlines our high standards of ethics and integrity, and can guide you as you care for our patients, customers, members, suppliers, vendors, and each other.

Thank you for doing your part to ensure our services are performed with honesty and integrity. If you notice anything you consider questionable, I urge you to report it immediately through the appropriate channels.

Thank you for all you do.

Sincerely,

A handwritten signature in blue ink that reads "Charles W. Sorenson, Jr." The signature is fluid and cursive.

Charles W. Sorenson, Jr., M.D.



➔ At Intermountain Healthcare, we are committed to creating and maintaining a culture that continually reinforces our high ethical standards. We believe honesty and integrity are essential to our mission and vision of providing extraordinary care and superior service to the people we serve. We embrace these standards of ethics and integrity because it is the right thing to do for our patients, members, their families, our community, and each other.

The purpose of this Code of Ethics booklet is to provide clear guidelines and expectations about our standards. Specific subjects are highlighted to illustrate what to watch for, and provide guidance on how these and other similar situations should be handled. Specific policies are identified that provide additional details about the standards. Please review these examples and refer to the Policy Library often, which is available on Intermountain.net. We believe we are able to successfully carry out our responsibilities with the highest standards of integrity when we know what is expected, have the information to support our decisions, and know where to find answers to questions and how to report concerns.

Because our high standards are so important, employees, clinicians, vendors, trustees, volunteers and other business partners of Intermountain must accept personal responsibility to act with the utmost integrity in all business activities and to adhere to the policies, regulations and laws that govern their work. Copies of Intermountain's Code of Ethics are provided to ensure that we all clearly understand our responsibilities as well as the potential consequences of misconduct. Depending on our status at Intermountain (employee,

clinician, trustee, vendor, volunteer), violations of this Code of Ethics, or the underlying laws and regulations, may result in disciplinary action up to and including termination; suspension of privileges; termination of business relationships; civil or criminal liability, and/or financial penalties.

GENERAL ETHICS STANDARDS

- 1.** We are committed to Intermountain's values of Trust, Excellence, Accountability, and Mutual Respect.
- 2.** We perform our jobs and assignments with the highest standards of honesty and integrity. We treat each other, our patients and members, business partners, vendors and competitors fairly.
- 3.** We know, abide by and understand the specific laws, policies and procedures that apply to our jobs and assignments, and to us as individuals.
- 4.** We speak up with concerns about compliance and ethics issues. Specifically, we report observed and suspected violations of laws or policies, and we agree to report

any requests to do things we believe may be violations. Furthermore, we cooperate with any investigation of potential violations.

- 5.** We recognize that our daily work gives us each the opportunity to see problems in our local areas before they become apparent to others or to management. We are empowered and responsible to raise questions about potentially noncompliant or unethical practices.
- 6.** If we have questions about a situation, we ask for help. We may talk to our supervisor or director, the facility/entity compliance coordinator, a company attorney, the Corporate Compliance Officer, or call the 24-hour Compliance Hotline at (800) 442-4845.



SPECIFIC ETHICS STANDARDS

OUR RESPONSIBILITY TO FAIR AND ETHICAL BUSINESS PRACTICES

➔ **WE RESPECT THE PROPRIETARY INFORMATION OF OTHERS.** Just as we protect our own confidential information, we respect the proprietary and confidential information of others. This includes written materials, software, music and other intellectual property.

Link(s): Intellectual Property Policy; Copyright Permission Procedure; Information Technology Resources Policy



Any software used at Intermountain must be licensed and approved—and used as outlined in the software owner's license agreements.

Copyright permission should be obtained from the copyright holder prior to use. Permission should be obtained on all non-government or non-public domain materials, including print, audio, and video.

➔ **WE ENSURE ACCURACY OF RECORDS AND REPORTING.** Intermountain's credibility is judged in many ways—including the accuracy and completeness of our records. These include business records such as financial transactions and financial reports, personnel, insurance and medical records. We depend on accurate and reliable information to make responsible business decisions. We ensure that our records are accurate and not misleading.

Link(s): Coding Ethics Policy; False Claims Prevention Policy

We create, approve, and archive records to document our work, including the services rendered to patients, members and others; work performed by employees, contractors and others; and purchases made from vendors. The accuracy of records involves both factual documentation and ethical evaluation/appraisal. In addition, we retain records according to legal requirements and Intermountain's record retention schedules.

Link(s): Record Management Policy

We comply with local and national laws relating to the accuracy and completeness of all records. We are honest, objective, and accurate in our recordkeeping. If we make mistakes, we will follow standard protocol to correct them and will not hide them. Altering documentation of any type to hide or mislead the users of this documentation is not appropriate. Coding and billing records are created based on accurate documentation that supports each claim.

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Several government agencies have implemented time-sensitive reporting requirements. Our "time clock" begins the minute any Intermountain employee knows of the error. Please call the Compliance Hotline (800) 442-4845 as soon as a mistake in billing or breach of patient information is known.



➔ **WE CAREFULLY REVIEW FINANCIAL RELATIONSHIPS WITH PHYSICIANS AND OTHER HEALTH CARE PRACTITIONERS FOR COMPLIANCE WITH THE ANTI-KICKBACK AND STARK LAWS.** All financial arrangements and contracts with physicians and physician groups must have Legal Department review. Intermountain will not improperly induce or reward referrals of patients or services as prohibited under these laws and regulations.

Link(s): Business Courtesies Physician Family Policy; Office Space Equipment Lease Policy; Physician Purchase Arrangement Policy; Physician Employment Policy; Medical Director Non Employed Physician Policy; Physician Recruitment Policy; Medical Director Part Time Employee Policy; Physician Loan Policy; Marketing Medical Staff Members Policy; Physician Voluntary Leadership Policy; Physician Personal Services Policy; Vendor Relations Physician Owned Policy; Contract Review Signing Authority Policy; Property Lease Management Policy

➔ **WE MAINTAIN OUR COMMUNITY’S TRUST BY COMPETING FAIRLY IN THE MARKET.** We comply with anti-trust laws. Anti-trust laws are designed to create a level playing field in the marketplace and to

promote fair competition with other health systems and facilities in markets where we operate. We risk violating these laws by discussing with a competitor certain aspects of Intermountain’s business such as how we establish our prices, the terms of supplier relationships, or agreeing with a competitor to refuse to deal with a supplier. In general, we avoid discussing potentially sensitive topics with competitors or suppliers without first seeking the advice of Intermountain’s Legal Department.

Link(s): Code of Conduct Business Ethics Policy

➔ **WE INTERACT WITH VENDORS HONESTLY.** We value our vendors as they play a role in the success of Intermountain. Vendors include suppliers, external consultants, on-site contractors, service providers and other representatives who are hired to perform services for Intermountain. Our selection of vendors will be made on their ability to meet our business needs, rather than on personal relationships and friendships, or on any inducements or personal offers. We interact with our vendors with honesty and integrity, which

includes not taking kickbacks or bribes from them or offering such inducements ourselves. When working with vendors, we do so free from conflicts of interest and are compliant with applicable laws and fair business practices.

Link(s): Conflict of Interest Policy; Vendor Relations Policy; Contract Review Signing Authority Policy

We do not request additional items or services from our vendors that are over and above their contracted service. For example, we do not ask for items such as pens, pencils, notepads, etc., nor do we ask for items such as gift certificates, supplies, or sponsorships for other events.

We understand that occasionally exchanging small gifts with others can help strengthen relationships and help create a positive overall work environment. Gifts of any kind from vendors are discouraged and not solicited. We exercise professional judgment in each case, considering

the circumstances at hand—this includes the context in which the gift was made, applicable laws, and Intermountain’s related policies.

- We only accept entertainment that is appropriate in an existing business relationship and which does not influence or appear to influence our decisions and actions.
- Examples of entertainment that may be appropriate to accept are meals, attendance at a local theater or sporting event, or similar entertainment.

Link(s): Code of Conduct Business Ethics Policy; Conflict of Interest Policy; Vendor Relations Policy; Business Courtesies Physician Family Policy; Business Entertainment Policy



➔ **WE ACT AS A RESPONSIBLE NON-PROFIT ORGANIZATION.**

As a non-profit organization, we engage in activities to further our charitable mission, including responsible financial activities.

This means we:

- Avoid compensation arrangements in excess of fair market value.
- Avoid actions that inappropriately create revenues for Intermountain, such as intentionally billing claims incorrectly.
- Accurately report payments to appropriate taxing authorities.
- File all tax returns and information in a manner consistent with applicable laws.

As a not-for-profit organization, we are bound by federal tax law to make sure that we operate for the benefit of the community, and not for the benefit of any private individuals or groups. All payments and business dealings must be reasonable and may not provide an excessive financial benefit to any party.

Link(s): Compliance Policy; Code of Conduct Business Ethics Policy; Financial Assistance Policy; Physician Personal Services Policy

Not-for-profit organizations are formed to operate for the benefit of the communities they serve. Surplus funds are used to cover operating expenses and are typically reinvested to further their charitable purposes.

In exchange for these charitable activities, the organization is exempted from paying many federal, state, and local taxes. To retain its tax exemption, a not-for-profit organization must meet rigorous standards established by federal, state, and local tax authorities.

Intermountain's gifts to the community include the provision of charity care (services provided at reduced or no cost), funding of school and community-based clinics, sponsoring of health fairs, gifts to other non-profit, health-related organizations, etc.

➔ **WE FOLLOW ALL LAWS AND REGULATIONS.**

We know, understand and abide by all laws and Intermountain policies that apply to our jobs or assignments. Intermountain will honestly report violations of law to the appropriate authorities. We refrain from conduct which may violate any laws pertaining to fraud and abuse of governmental funds.

Link(s): Compliance Policy; False Claims Prevention Policy; Compliance Violation Reporting Policy

The Federal False Claims Act makes it a crime for any person or organization to knowingly make or file a false claim for payment from the federal government. There are provisions that allow an individual who knows that a false claim was submitted for payment to file a lawsuit in federal court on behalf of the government.



➔ **WE COOPERATE WITH AND DOCUMENT GOVERNMENT INQUIRIES AND INVESTIGATIONS.**

Intermountain is regulated by state and federal agencies. From time to time, we may encounter officials responsible for regulating various aspects of healthcare or other business practices.



If we receive a non-routine request for information from a government investigative agency, external surveyor, or enforcement agency, either on site or through correspondence, we take the following steps:

- Check with management and Intermountain's *External Investigation Guideline* to assure we take all appropriate steps to protect our company's legitimate legal interests.
- Call the Compliance Hotline (800) 442-4845 and/or contact your Administrator or Facility Compliance Site Coordinator when an investigation or inquiry is under way.
- Protect the integrity of documents related to a known or possible government investigation.

Link(s): External Investigation Guideline; Record Management Policy; Law Enforcement Manual

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➔ **WE FOLLOW ENVIRONMENTAL REGULATIONS.**

We abide by all laws, regulations, and company policies relating to the protection of the environment.

Link(s): Hazardous Materials Policy

OUR RESPONSIBILITY FOR CONFIDENTIALITY AND PRIVACY

➔ WE USE CARE WITH PROPRIETARY AND CONFIDENTIAL INFORMATION THAT COULD IDENTIFY EITHER PATIENTS OR MEMBERS.

We protect proprietary and confidential information by:

- Following Intermountain's policies related to protecting nonpublic information.
- Properly disposing of nonpublic information when it is no longer necessary to maintain it.
- Taking appropriate safeguards when transmitting nonpublic information.
- Complying with agreements signed to protect the confidentiality of information. We are responsible for knowing what these agreements require and abiding by them.

*Link(s): Confidentiality Policy; Protected Health Information Safeguards Policy;
Privacy Agreement Policy; Privacy Rule Administration Policy*



Clinicians should only access patient information where an established care provider relationship exists, a new patient relationship is developed, or a request for consultation or quality review is made.

➔ **WE PROTECT PRIVACY AND CONFIDENTIALITY.**

While working for, or providing a service for Intermountain, we are committed to safeguard the privacy of patient, member and proprietary information maintained by Intermountain. This obligation applies even after we are no longer employed or associated with Intermountain.

Link(s): Confidentiality Policy

When someone who is usually a caregiver becomes a patient (e.g. nurse becomes a patient), we must remember to protect their privacy as a patient. It is not appropriate to access co-worker information (unless it is part of our job duties). We should not discuss with the patient's co-workers the fact that a fellow employee is being treated.

Accessing protected health information of a family member, when the information is not needed for your job, is a violation of our policy.

Access to your own treatment information can be obtained through *My Health*, or by requesting a copy of your records from the facility that provided the treatment. Using your job-related system access to look at your own records is normally not part of your job assignments, and therefore, not appropriate.

➔ **WE PROTECT IDENTIFIABLE PATIENT AND MEMBER INFORMATION.** We routinely collect personal information about our patients and members in order to provide care. We understand how sensitive this information is and maintain its confidentiality accordingly. Consistent with privacy laws, we only disclose patient identifiable information to care for or serve the patient, obtain reimbursement for their care, or as allowed by law. In certain situations, Intermountain may use health information for other limited purposes, such as for research or analysis. When this is the case, we will only do so as the law or the patient permits.

Identifiable information includes any information that could identify the patient or member, not just their name or picture (e.g. a date of treatment, or their zip code, in combination with other information such as their diagnosis or procedure, may be enough to identify them).

Link(s): Social Media Guideline; Protected Health Information Authorization Policy; Protected Health Information Legal Disclosure Policy; Protected Health Information Safeguards Policy; Protected Health Information Permitted Disclosure Policy

We do not discuss a patient's information with our friends, family, or through social media. We have a responsibility to respect patient privacy in all settings. When discussing or describing patients through social media, it is similar to actually posting an image of them for others to view.

Intermountain's Access and Confidentiality Agreement describes our responsibility to not disclose information about our patients and members without proper authorization. This applies even after our employment or association with Intermountain ends.

Privacy regulations require that we notify the individual and the federal government of privacy breaches of patient information—which may include inappropriate access to family members' and co-workers' records. This notification requires an explanation of the breach, so it is possible that if you inappropriately access a family member's or co-worker's information, they may deduce from the explanation of the breach that you are the person who accessed their information inappropriately.

➔ **WE MAINTAIN COMPUTER AND NETWORK SECURITY.** Intermountain's computer systems are critical to help provide care to patients and members. To protect these systems, we comply with Intermountain's policies related to computer and network security.

Link(s): Information Systems Security Policy; Information Technology Resources Policy

Accessing sexually explicit, offensive, or violent material may result in the termination of access to Intermountain's information systems resources. In some instances this may also result in termination of employment.

➔ **WE SAFEGUARD AND PROTECT THE CONFIDENTIALITY OF INFORMATION CONTAINED ON INTERMOUNTAIN'S COMPUTER AND NETWORK SYSTEMS.** We only use and access Intermountain's systems as necessary to perform our assigned functions.

Link(s): Information Systems Security Policy



Ways to protect confidential information:

- Appropriately using passwords, access codes and screensavers
- Log-off computers when we are finished or away from the computer

➔ **WE SAFEGUARD PERSONNEL INFORMATION.**

We recognize that our personnel records contain sensitive information. Intermountain will not disclose these records outside of the company, except upon an individual's own request, for a legitimate business reason, or as required by law.

Link(s): Personnel Record Policy



OUR RESPONSIBILITY TO OUR WORK ENVIRONMENT

➔ **WE PROVIDE A RESPECTFUL, CARING AND HEALING ENVIRONMENT FOR PATIENTS AND FAMILIES.** This means:

- We help patients understand and exercise their choices: we keep patients, and when authorized, their families and others informed of options in directing their own care, treatment, and services.
- We listen with sensitivity and consider the informed preferences of patients, including informed decisions to discontinue care, treatment, and services.
- If a conflict arises during a patient's treatment, we offer clinical and ethical consultations to patients and families.
- We protect our patients' dignity, respect their cultural, psychological and spiritual values, and safeguard their personal information.

Link(s): Patient Choice Policy; Advance Care Planning Policy; Patient Rights Document

➔ **WE MAKE REASONABLE ACCOMMODATIONS FOR INDIVIDUALS SEEKING SERVICES WITH SPECIAL COMMUNICATION NEEDS.** Communication assistance is provided for patients and members with impaired sight, hearing, or limited English proficiency.

Link(s): Communication Assistance Policy

Using one of Intermountain's qualified interpreters should be the first choice when communication assistance is needed. If a patient or family member insists on using someone other than a qualified interpreter (such as another family member or friend) for interpretation, a qualified interpreter should be involved to ensure that legal, consent, or other critical information is interpreted appropriately.

➔ **WE DOCUMENT AND REPORT EVENTS SO THAT WE CAN IMPROVE OUR PROCESSES AND REDUCE THE RISK OF HARM.** When an unexpected event impacts, or may impact, the quality of patient care, or safety of our patients, members, visitors or ourselves, we report these incidents.

Link(s): Event Reporting Policy



➔ **WE MAINTAIN OUR REQUIRED LICENSES AND PROFESSIONAL CREDENTIALS TO PERFORM OUR JOBS.** We understand the scope of practice that our licensure or credentials permit us to perform and stay within those boundaries. When a job requires a license or specific credentials, we only allow individuals with current and valid licenses and credentials to perform those functions. Individuals who have been excluded from participating in federally funded health care programs are not permitted to practice or bill through Intermountain.

Link(s): Licensure Certification Registration Policy

➔ **WE ADDRESS INAPPROPRIATE**

BEHAVIORS. We treat each other with honesty and respect. We have processes in place to address disruptive or inappropriate behaviors and performance issues through our Constructive Discipline processes and Medical Staff Bylaws.

Link(s): Constructive Discipline Policy; Employee Complaint Resolution Policy; Harassment Free Workplace Policy

We are expected to act professionally and refrain from making comments, gestures, or acting in any manner which can be construed as harassing or disruptive. Retaliation against anyone reporting inappropriate behaviors in good faith is strictly prohibited.

➔ **WE ARE COMMITTED TO EQUAL OPPORTUNITY EMPLOYMENT.** We make employment decisions without considering a person's age, disability, gender, gender identity, national origin, ethnicity, race or color, religion, sexual orientation, genetic information, military, or veteran status.

Link(s): Equal Employment Opportunity Policy



➔ **WE ARE COMMITTED TO FAIR PRACTICES.**

We understand that the depth of talent of Intermountain personnel comes from our diversity. By continuing to recruit the most qualified employees from a diverse pool of applicants, Intermountain is committed to equal opportunity employment. Talent and performance serve as the basis for advancement within Intermountain.

Link(s): Equal Employment Opportunity Policy

