



OHSUHealth
Hillsboro Medical Center

HILLSBORO MEDICAL CENTER

Code of Conduct

Revised 2024

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1 Introduction

Letter from the President



Dear Colleagues,

For over a century, Hillsboro Medical Center (HMC) has proudly provided our community with quality care by serving every patient with compassion, dignity and respect.

To build a healthier community, we must earn and maintain the trust of those we serve. We accomplish this by demonstrating unwavering dedication to our values of compassion, collaboration, excellence and integrity. Our Code of Conduct ("Code") reflects these values, especially our value of integrity, and is an important part of our commitment to upholding them.

The Code covers a variety of topics and basic principles related to our personal conduct when performing our jobs. Its primary goal is to guide us in each of our roles toward creating a work environment that promotes cooperation, excellence and compliance with the law.

Everyone who is a part of the HMC workforce must follow and support the Code, the mandatory standards it sets forth, and HMC's related policies and procedures. Many standards described in the Code are covered in further detail in our Hillsboro Medical Center policies, available on Tualipedia. Adherence to the Code is an important responsibility that you should take seriously. Please follow-up with your manager or Human Resources if you have questions about your responsibilities related to the Code.

As a mission-driven organization, we rely deeply on our community's trust. How we behave both individually and collectively shapes our reputation, which is earned one encounter at a time. Our continued success depends on our honesty, transparency, and accountability in every task and in every interaction.

Please review the Code carefully, follow the standards it outlines, and model best practices and behaviors in your work. When we take time to do what is right and act with integrity, we make HMC an even stronger organization. Thank you for your ongoing service and commitment to our patients, each other and HMC!

Sincerely,

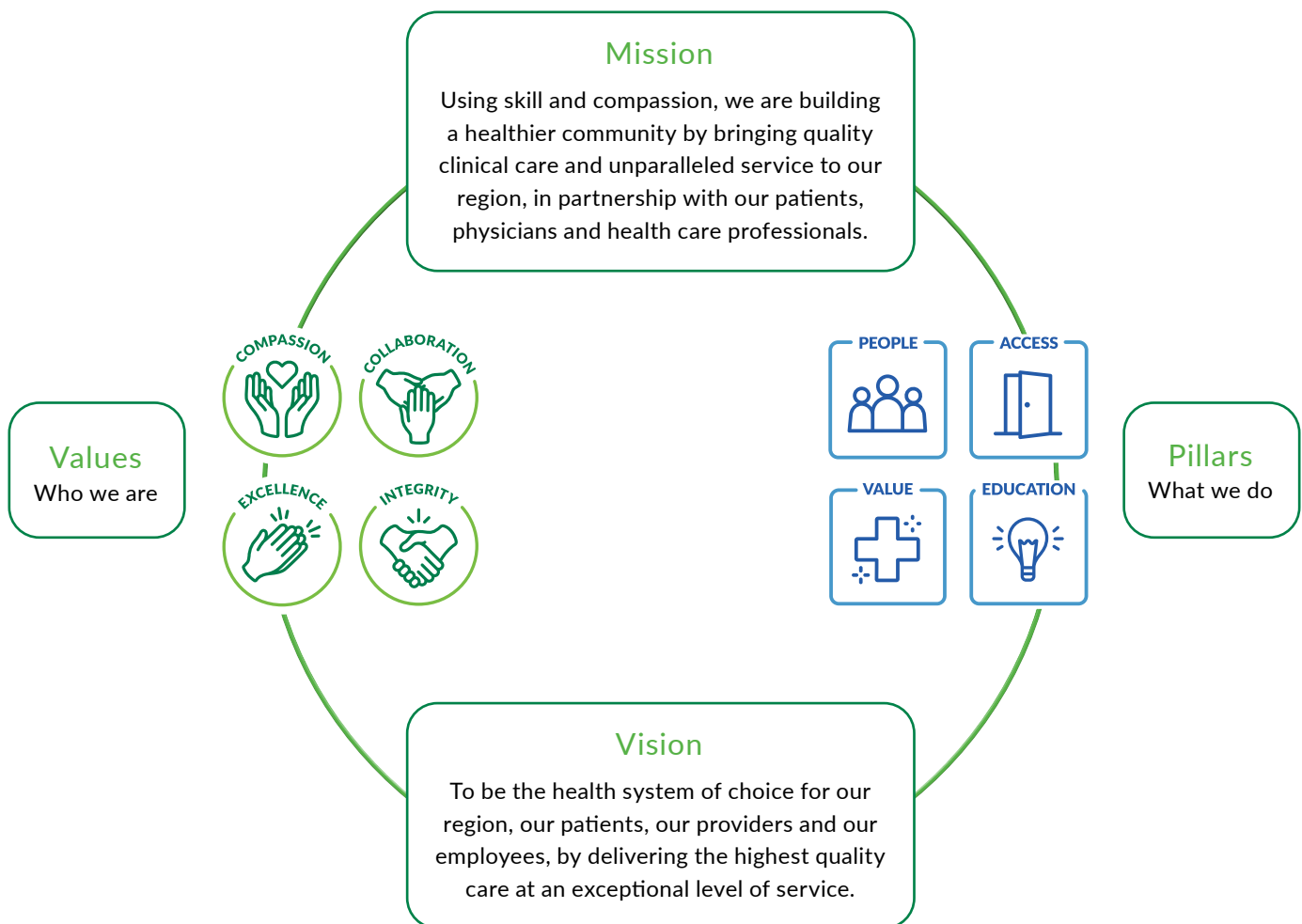
Lori James-Nielsen

President & Chief Executive Officer, Hillsboro Medical Center

We are Hillsboro Medical Center

We are proud to serve as the center of health and wellbeing in the community we call home.

Serving our patients and our community begins with how we treat and interact with each other in the workplace. The building blocks of our working relationships are expressed in our mission, vision, pillars and values.



Hillsboro Medical Center Community

This Code of Conduct (The Code) is part of Hillsboro Medical Center's program of corporate compliance and has been approved by the HMC Board of Directors and adopted as HMC policy. All members of the HMC workforce are held to its standards.

THE HMC WORKFORCE INCLUDES ANYONE WORKING FOR OR ON BEHALF OF HMC, SUCH AS:

- HMC Board of Directors
- HMC Employees
- HMC Students and trainees (e.g., residents, post-doctoral fellows on training grants)
- HMC Volunteers
- HMC Medical staff, researchers and healthcare practitioners
- Contractors, suppliers, and vendors while doing business with HMC

Policies

HMC maintains and makes available policies, procedures, rules and standards (collectively referred to in this Code as "policies") that support the Code and provide additional information for how you are expected to do your work. HMC policies — whether developed by the organization or your work unit — may be more detailed or specific than the Code but are part of the Code. You may need to complete training about a policy and how to follow it. Other times, your leader will expect you to read and understand the requirements on your own.

While this Code references policies regarding the business and operations of HMC, it does not contain every policy that you are expected to follow. For example, this Code does not cover payroll, vacation and benefits policies, department-specific policies and other policies with which members of the workforce are required to comply. You should discuss with your supervisor any questions regarding which policies apply to you. You are expected to know, understand, and comply with all policies that apply to you and/or your work at HMC.

Related Policies & Resources

[Policy & Procedure Management Guide](#)

Compliance Plan

HMC maintains a Compliance Plan that provides a framework for HMC to comply with the Code, applicable laws, and regulations, and to detect non-compliance should it occur. Our Compliance Plan is designed to address any current and prevent any future noncompliance through education, monitoring and enforcement of HMC's requirements. Our Compliance Plan applies to all members of the HMC workforce and their activities, but each individual remains responsible and accountable for his or her own compliance with applicable laws, regulations, standards, policies and procedures. HMC's Compliance Plan includes a Hotline reporting tool and resources for questions and concerns about health care regulatory matters. You can find contact details in the Contact Information section of this document.

Related Policies & Resources

[HMC Policies & Standards of Practice](#)
[O-1093-POL Compliance Program](#)

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The Code

The Code

As members of the HMC workforce, we all have a duty to uphold the Code of Conduct, our policies and the law. Anyone who violates laws, policies or the Code may be subject to disciplinary actions, up to and including termination of employment or contract with HMC, according to the HMC's discipline guidelines and, if applicable, the terms of any contracts and labor agreements.* In addition, an individual failing to comply with certain of these requirements may be subject to criminal and civil penalties.

YOUR RESPONSIBILITIES:

- Understand and comply with the expectations of you and for the work you do.
- Read, understand and follow the principles and requirements of the Code and HMC policies and procedures.
- Ask for help if you do not understand a Code requirement, policy, procedure or other standard that applies to you. If you have any questions or uncertainty regarding these standards, it is your responsibility and obligation to seek guidance from your leader or Human Resources representative.
- Know that a violation of your responsibilities, as explained in the Code — or a violation of other organizational standards, policies or applicable laws — can result in disciplinary action. Action could include coaching, warning, suspension or termination of your employment, contract or other relationship with HMC.*
- Know that if you do something illegal or unethical, we may have an obligation to notify law enforcement and/or the applicable professional board or licensing organization.
- Inform your leader, HMC Human Resources and/or the Compliance Team if you are convicted of a crime or if you receive a notice of exclusion from HHS-OIG barring you from participation in Medicare, Medicaid and other federal health care programs.
- Promptly report any concerns related to this Code, HMC policies or other standards and requirements using the Contact Information section of this document.
- Take action if you see or know of behavior or processes that are not consistent with the Code. In some cases, this can mean making a simple and respectful reminder to a colleague. In other instances, it may be important to notify your leader, Human Resources or the Compliance Team.
- At all times, act according to the Code. Make sure that all your work and decisions are in line with the requirements in our policies, procedures and other standards.

*Note: Specific provisions in collective bargaining agreements that do not align with this Code will prevail. Our Code is an evolving document that will be updated periodically to respond to changing conditions and to reflect changes in law. HMC reserves the right to amend, modify or delete provisions contained in the Code at any time and will notify employees of any significant changes that may affect them. All decisions regarding the application and interpretation of the Code are under HMC's discretion.

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Work Environment, Personal Conduct & Behavior Standards

Organizational Values

Hillsboro Medical Center is committed to providing a safe, healthy and inclusive work environment everyone. Workforce members are expected to conduct themselves in a manner that is consistent with our Values:



Compassion: We create a welcoming environment of kindness, inclusivity and responsiveness that truly values every individual.



Collaboration: We work together with one another, with our patients, and with our community to improve the health and wellness of Hillsboro and Washington county.



Excellence: We provide access to the highest quality care through our preparation, education and dedication.



Integrity: We are committed to honesty, transparency, and accountability in every task and every interaction.



Diversity, Equity and Inclusion

Diversity at HMC means creating a community of inclusion. HMC is committed to the ongoing journey of acknowledging the enduring impacts of historical injustices on health; addressing clinical, social, and structural systems and conditions that undermine health and wellness; and we strive to become a culturally proficient workplace that reflects our community.

We accomplish more as a team when we include people with diverse backgrounds, talents and contributions.

We respect and value the unique contribution each person brings to the HMC community. We strive to foster an environment of belonging, respect, and inclusion where everyone feels empowered and safe to bring their full, authentic selves to the work.

HMC does not allow discrimination against any person based on race, color, sex, religion, age, faith national origin, marital status, family relationship, or disability in admission, treatment, or participation in its programs, services, and activities, or in employment. Such discrimination includes (but is not limited to) discrimination and harassment based on gender, gender identity, gender expression or sex, sexual harassment, sexual misconduct, sexual violence, and retaliation for reporting such concerns.

Related Policies & Resources

[HR-1062-POL Equal Employment Opportunity](#)

[HR-1076-POL Employee Transitions](#)

Workplace Health and Safety

HMC is committed to providing a safe, healthy and healing environment. Workforce members must use sound and safe procedures, be alert to health and safety risks, look out for the safety of others and speak up whenever a potential hazard is identified.

YOUR RESPONSIBILITIES:

- Always take the necessary steps and precautions to safely perform your duties.
- Educate yourself and understand how applicable safety laws, best practices, and HMC policies and procedures impact your role, your responsibilities, and the work environment.
- Help contractors and third parties to act in accordance with our safety requirements.
- Report unsafe work acts, conditions and any situation posing a danger of injury.
- Promote a healthy environment by following our Tobacco Free Policy.
- Do not use alcohol or illegal drugs while working or on call.
- Do not perform any of your job duties while under the influence of alcohol or illegal drugs or while using prescription drugs in a way that may negatively impact your performance or your judgment in your work. Anyone who appears to be under the influence of alcohol or drugs while working on behalf of HMC, misuses a prescription drug and/or is involved in a drug diversion may be subject to disciplinary action, including termination of employment.

Related Policies & Resources

[SAF-1002-POL General Safety, Unsafe Conditions and Practices](#)

[SAF-1004-POL Safety Education and Training](#)

[HR-1037-POL Maintaining a Drug Free Workplace \(HR-1037-POL\)](#)

Personal Conduct & Behavior Standards

HMC's Personal Conduct & Behavior Standards are intended to foster a professional and productive work environment by clarifying expectations of all workforce members.

Every member of HMC's workforce is expected to behave in a professional manner consistent with HMC's organizational values and treat all fellow workforce members, patients and community members with courtesy, respect and regard for their dignity. Workforce members must refrain from engaging or encouraging inappropriate or disruptive behaviors.



APPROPRIATE BEHAVIOR INCLUDES:

- Treating all patients, staff and colleagues with dignity and empathy.
- Conducting all verbal, nonverbal and written communication in a respectful manner.
- Being honest/honorable in all encounters, intentions and actions.
- Upholding and complying with all ethical and legal standards.
- Respecting the privacy and confidentiality of patients and their protected health information.

INAPPROPRIATE OR DISRUPTIVE BEHAVIOR INCLUDES, BUT IS NOT LIMITED TO:

- Using condescending language or making belittling/demeaning comments regarding patients or their families, members of the workforce, and/or the hospital.
- Use of profanity or disrespectful language.
- Writing inappropriate comments in medical records.
- Falsification, alteration, or destruction of hospital and/or medical records.
- Fraud (intentional deception or misrepresentation) or abuse (a practice or activity that is not part of generally accepted, sound industry standards that may result in unnecessary costs or the receipt of an improper payment).
- Blatant failure to respond to patient care needs.
- Conduct that interferes with the provision of quality patient care, including lack of cooperation and teamwork.
- Inappropriate expressions of anger, such as destruction of property or throwing objects.
- Engaging in any form of harassment or bullying.
- Engaging in any form of workplace violence or physical assault.

Personal conduct and behavior problems will be addressed in accordance with HMC's Corrective Action Policy, Medical Staff Bylaws, and other applicable policies.

Related Policies & Resources

[HR-1058-POL Conduct and Corrective Action Plan](#)

[Medical Staff Bylaws](#)

Harassment & Bullying

HMC does not tolerate harassment or bullying. This includes any conduct, whether in-person, electronic, physical, nonverbal, verbal, visual or other conduct, that disrupts another person's work performance or intends to victimize, humiliate, undermine, or threaten an individual or group or that creates an intimidating, offensive, abusive, or hostile work environment.

YOUR RESPONSIBILITIES:

- Do not engage in degrading jokes, slurs, discrimination, physical or verbal intimidation, unwelcome sexual advances or other disrespectful conduct when interacting with others. Offensive messages, derogatory remarks, symbols and inappropriate jokes can all be forms of harassment, may result in disciplinary action up to and including termination, and are inconsistent with our culture and beliefs.
- Speak up! Be direct and tell a person if you are upset by their actions or inappropriate language. If possible, explain why and ask them to stop. Make a formal complaint if the behavior continues, if you are uncomfortable taking a direct approach, or when such resolution is not possible or appropriate.
- If someone says you are offending them with your words or actions, you must stop at once, even if you believe you are acting innocently or inoffensively. You must also not retaliate or act out toward them for speaking up.
- Remember that harassment and bullying behaviors violate our values and may violate the law, even when they involve individuals outside the HMC community or occur outside the workplace, including virtual or remote work or learning environments.

Related Policies & Resources

[HR-1059-POL Discrimination and Harassment - Prohibited Behavior](#)

Violence in the Workplace

Everyone visiting our facilities is entitled to a safe and supportive environment. Violence or threats of violence are inconsistent with HMC's Mission and Values and will not be tolerated. This standard applies to all members of the HMC workforce, patients and visitors.

YOUR RESPONSIBILITIES:

- If you see something, say something! Report any and all concerns.
- Take immediate action if you feel a workforce member, patient or a visitor is creating an unsafe situation. Address the behavior directly if it is safe to do so. If the situation is more concerning, notify your manager, the House Supervisor, and/or Security (off-site clinics, call 911).
- Familiarize yourself with your department's safety and emergency procedures.
- Sign up to receive emergency notifications via Everbridge.
- Do not use threats, intimidation or violence.
- Do not possess any weapon on HMC property.

Related Policies & Resources

[Employee Safety & Security Resources](#)

[HR-1060-POL Violence in the Workplace](#)

4

Patient Care and Patient Rights

Patient Care and Patient Rights

YOUR RESPONSIBILITIES:

- Communicate with patients and their families in a way that is clear and understandable.
- Do not discriminate in any way against patients. We must provide and deliver care to everyone with the same high level of respect and dignity in a setting that is free from abuse, discrimination or harassment.
- Listen to and act on patients' wishes about their care. Respect the choices they express in advance directives. Do not discriminate against patients who have not adopted advance directives for their care. If, for some reason, we cannot provide the care a patient needs or requests, fully inform the patient about his or her condition and alternatives for care.
- Respect the spiritual and cultural values of each patient and those of their family. Make sure to communicate with and care for them in a way that respects those values.
- Inform patients of care plans and alternatives, involve them with decisions, ensure they give their informed consent and allow them to refuse care to the extent required or permitted by law.

Dignity, Respect and Choice

HMC is committed to providing compassionate, appropriate, high-quality, cost-effective care in a manner that honors the rights of our patients and is sensitive to our patients' and families' individual and personal beliefs and respects the cultural, spiritual, and personal values that influence perceptions of illness and decisions about care and treatment.

We offer care equitably, without regard to race, marital status, gender, sexual orientation, gender identity, genetic information, national origin, language of origin, age, physical or mental disability, religion, veteran status or public programs status.

Our patients have rights:

- To receive information from their physicians and to have the opportunity to discuss the benefits, risks, and costs of appropriate treatment, alternatives, including the risks, benefits, and costs of forgoing treatment. Patients should be able to expect that their physicians will provide guidance about what they consider the optimal course of action for the patient based on the physician's objective professional judgment.
- To ask questions about their health status or recommended treatment when they do not fully understand what has been described and to have their questions answered.
- To make decisions about the care the physician recommends and to have those decisions respected. A patient who has decision-making capacity may accept or refuse any recommended medical intervention.

Related Policies & Resources

[PC-1005-POL-RR Patient Rights and Responsibilities](#)

[C-1007-POL-RR Informed Consent](#)

[IPP-19 Individuals' Right to Request to Access, Inspect, or Copy Protected Health Information](#)

[IPP-20 Individuals' Right to Request an Amendment to a Medical Record](#)

Emergency Care

YOUR RESPONSIBILITIES:

- Workforce members at clinical sites are expected to be familiar with and follow EMTALA's requirements and HMC's policies regarding emergency treatment, stabilization and transfer procedures under EMTALA.
- If an individual arrives at HMC, do not delay in providing emergency medical screening or emergency care for a non-medical reason (including a financial reason or for a reason not requested by the patient).
- If you work in HMC's emergency setting, make patient transfers to other facilities only when requested by the patient or when HMC does not have the capacity or capability to meet the patient's medical needs, and the patient is stable, or the risks of transfer are outweighed by the benefit of more appropriate care to be provided by another facility that accepts the transfer.

All individuals are entitled to prompt and appropriate emergency care. We follow the laws related to emergency care, including the Emergency Medical Treatment and Labor Act (EMTALA), by providing medical screening examinations and, if appropriate, stabilizing treatment to all individuals who come to HMC for emergency treatment or who are in labor -- regardless of their ability to pay.



Related Policies & Resources

[HC-1009-POL-RR Emergency Medical Treatment and Labor Act \(EMTALA\) Compliance](#)

[ED-1062-POL Standards of Care -- Adult Patients in the Emergency Department](#)

Patient Privacy

We honor the trust that patients and research participants place in us by protecting their information. Protected Health Information (PHI) is any information about a patient that relates to their past, present or future health care, conditions, eligibility for health care, payment for health care, and demographic information, including the fact that they are an HMC patient. PHI is deeply private and personal to our patients and is protected by law. You must understand all patient privacy expectations related to your job –both HMC organizational standards and privacy laws. Some privacy laws can be complicated, so make sure that you understand how they apply to your work and ask your leader questions if you do not understand.

YOUR RESPONSIBILITIES:

- Access, use and release PHI only as allowed by law and HMC policies, procedures and other standards governing privacy and confidentiality of patient information.
- Protect the privacy and privacy rights of patients and research participants at all times, even after your (or their) affiliation with HMC has ended.
- Sharing PHI, whether in words or pictures or in any communication channel or form with anyone who does not have a legitimate business or clinical need to know the PHI is strictly prohibited.
- Do not look up or use patient information or patient research information for personal reasons or to make employment-related decisions. You must always have a legitimate, job-related business/clinical need-to-know reason to access, use or disclose PHI.
- Accessing PHI for personal reasons, curiosity or any other improper reason can result in disciplinary action up to and including termination of employment.
- Report any situation where PHI may have been viewed, used or shared in violation of the laws or HMC policies.

Related Policies & Resources

[Confidentiality of Health Information \(O-097\)](#)

[IPP-04 Notice of Privacy Practices](#)

[IPP-03 HIPAA Privacy Rule Transition Requirements](#)

[ISP-20 Information Privacy and Security Training Policy](#)

[IPP-09 Uses and Disclosures of Protected Health Information for Treatment, Payment, and Health Care Operations](#)

Licenses, Permits, Professional Qualifications and Professional Boundaries

HMC employs and contracts with people and organizations that are appropriately licensed, registered, certified, and credentialed and are eligible to perform their work within the scope of their professional licensure and standing. HMC health care practitioners, caregivers and other professionals must be qualified, eligible, and licensed to perform the services they provide for HMC consistent with applicable privileges approved and granted by HMC's governing body and consistent with HMC's medical staff bylaws, rules and regulations and applicable HMC policies and procedures. We will not knowingly employ or contract with an individual or organization that is sanctioned by or excluded from any government program in which we participate. We will not allow any health care practitioner or caregiver to provide care or treatment not within the lawful scope of their licensure, practice or professional privileges.

YOUR RESPONSIBILITIES:

- Keep your professional licensure, certification, registration and/or other qualifications in good standing so that you are eligible to perform your work with HMC. This is true regardless of your role – physician, nurse, technologist, language interpreter, attorney, actuary or any other profession.
- Tell your leader right away if any professional action has been started or taken against you, such as a board inquiry, suspension, revocation, expiration or lapse of license or eligibility.
- Understand when and what you (as a licensed health care practitioner) are required to personally report to your professional licensing boards – and let your leader know about it. If you are a health care practitioner or caregiver and have questions about your professional reporting duties, contact Human Resources or the Medical Staff Office.
- Tell your leader or Human Resources right away if you have been debarred or excluded from any government-sponsored healthcare or other contracting program, or if you are facing debarment, exclusion or other sanctions.
- Maintain appropriate professional relationships with patients and their families, within and outside the care setting. If you are a licensed health care practitioner or caregiver, you must follow all standards of professionalism established by your licensing board(s).
- Provide guidance to patients based on clinical and scientific facts and objective professional judgement within the limits of your own clinical knowledge and expertise.

Related Policies & Resources

[HR-1032-POL Documentation of Employee Licenses](#)

5

Research and Education

Research and Education

Research

HMC is part of OHSU Health System and research is critical to the System's mission. We are committed to maintaining a high-quality research program with the highest integrity, adhering to all laws governing the conduct of research. We foster an environment for our research participants that provides privacy, security and comfort. HMC is committed to following ethical standards and disseminating appropriate, valid scientific results in full compliance with federal and state laws and regulations with respect to any research, investigation and clinical trial conducted. We do not tolerate acts of plagiarism, falsification or fabrication of data and costs as an institution.

YOUR RESPONSIBILITIES:

- Respect all research participants.
- Do not discriminate against anyone based on their choice to, or not to participate in research.
- Engage all research participants or their appropriate representatives in a meaningful informed consent process.
- Protect research participants, laboratory personnel and scientific integrity by following processes of institutional review and approval for any research and disclosure of financial interests.
- Adhere to approved protocols and obtain prospective approval of any changes in those protocols.
- Ensure that reporting of research is accurate, scientifically valid, complete and unbiased.
- Comply with all requirements and stated terms and conditions of grant awards and contracts.
- Properly record and charge all costs to appropriate accounts.

Related Policies & Resources

[C-1015-POL-RR Clinical Research Studies, Investigational Drugs, Devices, and Procedures](#)

Education

HMC places a high value on intellectual curiosity, integrity and outstanding professional preparation. Fostering a culture of learning is important to us. Accordingly, we are committed to providing educational opportunities for current and future health care professionals. We are proud of the many residency and training programs available on our campus.

YOUR RESPONSIBILITIES:

- Promote a learning environment by being an active learner.
- Treat all learners with respect, protect their privacy and ensure a safe and equitable learning environment, free from discrimination, harassment, intimidation and retaliation, where all can express opinions and ask questions. Be supportive and encouraging.
- Respect instructors, mentors, administrators and fellow students.

Related Policies & Resources

[EDU-9001-SOS-RR Clinical Education \(Scope of Service\)](#)

[Student Placement Guidelines](#)

[HR-1044-POL Educational Opportunities and Meetings](#)



6

Personal and Corporate Integrity

Personal and Corporate Integrity

Truthfulness and Cooperation

We build trust with each other and with the patients we serve by telling the truth. Everything we do is grounded in our value of integrity as demonstrated by honest words, documentation and action. We maintain open, constructive and professional relationships with all internal and external partners, including regulators.

YOUR RESPONSIBILITIES:

- Demonstrate integrity in your daily actions. This includes avoiding plagiarism and being honest in everything you do as a part of your job, including your work product, care documentation, time reporting and expense reports.
- Be truthful and accurate when preparing or submitting any bill for services, any regulatory, accreditation or legal filing or certification, or responding to an external inquiry on behalf of the organization. Bill only for services actually provided, properly documented and coded.
- Cooperate with regulators, accreditation bodies, law enforcement and external auditors.
- Be honest and cooperative when there is an inquiry or investigation led or coordinated by someone in the organization, such as HMC Compliance, Quality, Risk or Human Resources.
- Contact HMC General Counsel or Risk Management immediately if, as a representative of the organization, you receive a summons, subpoena, inquiry or other communications from a court, law enforcement official, government agency or outside lawyer.



Outside Activities and Conflicts of Interest

In our work for and on behalf of HMC, we have a duty to put the interests of HMC before our own.

The term “conflict of interest” refers to situations in which financial or other personal considerations (not related to HMC) may compromise (or appear to compromise) an individual’s ability to make objective decisions in HMC’s best interest while carrying out the individual’s HMC job responsibilities.

When HMC workforce members have a financial interest in an entity that does business with, seeks to do business with, or is in competition with HMC, and they have the potential to influence HMC decisions with that entity, this is a potential conflict of interest. This must be disclosed so that a management plan can be developed, which generally will be to recuse that Member from decision making that impacts the business.

Outside activities such as consulting, board membership or outside employment can create a conflict of interest in different ways such as interfering with your ability to fulfill your HMC responsibilities, creating a risk that the outside activity leads to a disclosure of HMC confidential information, adversely affecting HMC’s reputation or inappropriately gaining financially from knowledge learned at HMC.

YOUR RESPONSIBILITIES:

- Employees should avoid actual or even the appearance of a conflict of interest.
- Employees must disclose all possible conflicts of interest involving themselves or their immediate family members (spouse, parents, brothers, sisters and children).
- Never use or disclose any HMC information (including patient or workforce member information, or other confidential business information) or intellectual property as part of any approved outside employment or consulting work.
- If you do — or are considering — any outside employment or consulting work (including for another organization that is affiliated with HMC), discuss it with your leader. Disclose all details of the proposed arrangement before you agree to it, so that your leader can review and determine the appropriateness of the arrangement. If the outside arrangement is approved, follow any management plan your leader puts in place to ensure that the arrangement does not violate the Code or HMC policies. Do not compromise judgment in work or duties to the organization.
- If you believe a conflict of interest exists or if you have any question about whether an outside activity might constitute a conflict of interest, you must obtain the approval of the HMC Compliance Committee before pursuing the activity. Refer to the HMC Compliance Program for more information.

Related Policies & Resources

[O-1093-POL Compliance Program](#)

[Conflict of Interest & Confidentiality Statement \(Boards, Managers, Directors, and Officers\)](#)

Gifts

HMC and HMC workforce members may not offer, solicit, or accept gifts or entertainment that may influence or appear to influence business, purchasing, patient care or referral decisions. As a nonprofit and tax-exempt organization, HMC relies on gifts and donations to provide critical support to our mission. Such gifts, however, are accepted by our Foundation on behalf of the organization and in accordance with relevant laws and regulations. HMC must diligently avoid any real or perceived conflict of interest or any inappropriate influence or unfair advantage when gifts are received from HMC vendors, referring health care practitioners, patients or other business relationships.

Related Policies & Resources

[O-1109-POL Vendor Gifts](#)

YOUR RESPONSIBILITIES:

- Do not solicit or accept gifts, entertainment opportunities, or favors from patients or their family members. Although small tokens of appreciation such as cards, flowers or candy may be accepted, if a patient or their family member wants to recognize you with other types of gifts or entertainment, you should contact the HMC's Foundation and help facilitate contact between the patient, family member and the Foundation.
- Do not solicit or accept gifts, entertainment opportunities or favors from vendors and suppliers of goods and services, such as medical device and pharmaceutical companies or from health care practitioners, government officials or other business relationships.
- Make contracting, purchasing and procurement decisions based on objective criteria (e.g., price, quality, technical expertise, timely delivery, services standards and supply quantity), not on personal financial benefit.

Political Contributions and Activities

Because HMC is a tax-exempt organization, there are strict limits on our public policy work and political activities. We do not make direct or indirect contributions to candidates running for federal, state or local office, or to political parties, organizations, or committees, except as allowed by law. It is important to make a clear distinction between one's personal political activities and those undertaken on behalf of HMC.

Related Policies & Resources

[HR-1042-POL Solicitation and Distribution of Literature](#)

YOUR RESPONSIBILITIES:

- HMC workforce members shall not act on behalf of HMC to solicit money, influence, service or other things of value for political campaigns or candidates; promote or oppose any political committee; or promote or oppose the nomination or election of a candidate.
- Make sure your behavior, dress, and conversations at work are not perceived to be politically biased or motivated. This is an important part of how we respect the diverse spectrum of people we work with and serve.
- Take part in the political process and advocate for causes you believe in on your own time and using your own resources, and not on behalf of HMC.

Fraud, Waste and Abuse

In accordance with our value of integrity, we work to prevent, detect, and correct fraud, waste, and abuse related to health care benefits paid by the government, commercial health plans, and employers.

Fraud: The intentional deception or misrepresentation made by a person with the knowledge that the deception could result in some unauthorized benefit to him/herself or some other person or entity.

Waste: Primarily the over-utilization of services, or other practices that, directly or indirectly, result in unnecessary costs to the Medicare, Medicaid and other government health care programs.

Abuse: Relates to practices that are inconsistent with sound fiscal, business, or medical practices and which result in unnecessary costs. This includes the destruction, diversion, manipulation, misapplication, maltreatment or misuse of resources.

HMC routinely reviews claims, medical records, patient satisfaction surveys, provider billing patterns, and performs other auditing, monitoring, and outreach activities. When fraud, waste or abuse is identified, we address the issue through appropriate corrective action, which may include a report of our findings to the government and a refund or repayment of any undue payment. Disciplinary action will be taken against anyone engaged in inappropriate behavior, up to and including termination of employment, and we cooperate fully with regulators and law enforcement when the behavior of a colleague is suspect.

YOUR RESPONSIBILITIES:

- Participate in regular training to help prevent, identify, report and correct practices that may lead to fraud, waste or abuse.
- Comply with all state and federal laws and regulations aimed at preventing, detecting and responding to actions of workforce members, patients, customers or others who attempt to dishonestly benefit from government, commercial health plan or employer payments to our organization.
- Take part in and cooperate with HMC activities to assess the likelihood or existence of improper activity, such as risk assessments, auditing, monitoring and investigations.
- Know that if you take part in fraudulent, wasteful, or abusive activity, you will be subject to discipline, which could include termination of employment. In some situations, you may also be subject to personal liability and criminal penalties.
- If you are aware of or suspect conduct that could be fraudulent, wasteful or abusive, report your concerns immediately to your leader or the Compliance Hotline.

Referrals of Care and Service

Our recommendations and provision of health care treatment and services are based on patient clinical needs and personal preferences — not what is best for HMC. Our financial relationships with health care practitioners and other patient referral sources will never be based on the value or volume of actual or potential referrals of patients and will always be within the legal standards of “commercially reasonable” and “fair market value.”

YOUR RESPONSIBILITIES:

- Do not solicit, accept or offer anything of value in exchange for patient referrals.
- Follow all laws about referring patients to other providers, facilities, suppliers and health plans. These laws, some of which are known as the Antikickback, Stark (or physician self-referral) and Patient Freedom of Choice laws, can be complicated; consult with the Compliance Team or General Counsel if you are considering an arrangement with an outside provider or supplier that might impact patient or Member referral patterns or choices.
- If you are a physician, do not refer patients to other providers or facilities with which you or your family have a financial relationship unless the relationship has been determined by HMC General Counsel to comply with applicable laws.
- Do not offer special benefits or incentives to patients or workforce members unless those arrangements meet very specific criteria approved in advance by HMC.

Fair Competition

We believe that a competitive marketplace is good for patients, workforce members, customers and the organization itself. We comply with antitrust laws and other laws that encourage fair trade and competition. We gather competitive intelligence in legal ways and respect the confidentiality of trade secrets.

YOUR RESPONSIBILITIES:

- Gather information about competitors in a way that is sensitive to legal restrictions and HMC's standards for integrity.
- Never misrepresent your identity, use improper influence or bribes or obtain competitive information in an illegal way.
- When considering entering into an arrangement with another health care provider, provider network, researcher, insurer or administrator, consult with HMC General Counsel to make sure the arrangement complies with applicable antitrust laws.
- If you are involved in trade group and professional association activities, consult with the HMC General Counsel to make sure you understand how antitrust restrictions apply in those settings.

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Using and Protecting HMC's Resources

Using and Protecting HMC's Resources

Every workforce member has a duty to preserve and protect the information and assets of the organization and ensure their efficient and appropriate use.



Using Technology and Information Security

HMC provides secure email and applications on HMC workstations and computers allowing you to communicate and collaborate securely from almost anywhere. We protect information through security measures that maintain the confidentiality, integrity and appropriate availability of data. This includes the protected information of patients, research participants and workforce members, and confidential business information. Access to and use of HMC information systems, including remote access, is protected by your password and multifactor authentication.

Related Policies & Resources

[ISP-20 Information Privacy and Security](#)

[Training Policy](#)

[ISP-21 Information Security Incident Reporting](#)

[HR-1034-POL Teleworking](#)

YOUR RESPONSIBILITIES:

- Comply with all information security policies and procedures.
- Be sure you log off any active session if you step away from a computer.
- Always communicate and send protected information in a secure way.
- Do not use free web-based tools or external e-mail (i.e., Gmail, Comcast, etc.) for collecting, storing, or transmitting information related to your work.
- Follow Information Technology Group (ITG) processes to request and enable new technology and tools. Make sure all devices and services you use in your work are approved and meet organizational standards for data security.
- Do not share your User or Administrator password(s) or other confidential authentication information with anyone, including ITG staff or supervisors.
- Do not use another person's password or other confidential authentication information.
- Do not allow others to access medical records and information under your log in account.
- Keep business and personal computing devices — such as desktops, laptops, tablets, smart phones, portable drives, and any other digital device, including company cameras — secure and in your control.
- Report any data security concerns immediately to the Information Privacy & Security Office or the ITG Help Desk.

Business Information and Intellectual Property

HMC's success depends in part on the unique nature of our services, products, systems and other business information. One of our most valuable assets is information and it is essential we protect the value of our business by keeping certain business information confidential.

YOUR RESPONSIBILITIES:

- Handle all confidential business information as carefully as you would handle patient information or your own personal information. Maintain the intellectual property rights of HMC and honor the intellectual property rights of others.
- When approved, share only "need to know" information, even when sharing within HMC.
- Only share business information outside the organization if approved by your leader and the information is protected by a confidentiality agreement with the receiving person/organization.
- Do not use or disclose confidential business information for personal gain or benefit, and do not share it with friends, family members, or others in the community.
- Even after your association with the organization ends, keep the organization's business information confidential.
- Follow intellectual and copyright laws regarding books, trade journals, magazines and other applicable resources.
- All software used in connection with HMC business must be properly licensed and used in accordance with that license.

Tax Exempt and Non-Profit Status

Our use of resources is consistent with HMC's patient care mission and our nonprofit purpose – not to serve the personal interests of any individual. Our special nonprofit status means that we follow a high standard in conducting our business and using our resources.

YOUR RESPONSIBILITIES:

- Make sure the work you do puts HMC assets and resources to proper use; do not waste time or money.
- Do not use our space, equipment and other resources for your own or others' personal activities or personal gain.
- Pay only reasonable, fair market amounts for goods or services provided by others, including providers, suppliers and vendors.
- Observe restrictions on the type of person and organizations we rent space to in our facilities.
- Honor our commitment to addressing community needs and providing charity care and financial assistance – make sure we give such assistance to patients who meet our organizational guidelines.

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Communication

Overview

Collaboration, mutual respect and clear communication are necessary parts of individual, team and organizational performance excellence. We communicate openly, honestly and in good faith with each other, those we serve, and the community.



YOUR RESPONSIBILITIES:

- Always be clear in your public communications about whether you are speaking as an individual or on behalf of the organization — and only speak on behalf of the organization if you are authorized to do so as part of your job.
- If you communicate about the organization or your work in a public setting or forum — in person, in writing, online, through social media, at a conference or in any other format— avoid using statements, images or recordings that could be viewed as unlawful, profane, discriminatory, threatening or hateful to another person or to an organization, including our organization, the people we serve, vendors, competitors or your colleagues.
- Whether you are discussing your work in a public setting, such as at a conference, or in a personal setting, such as at home, always follow organizational policies on privacy, business confidentiality, social media, e-mail and internet usage and conflicts of interest.
- If you receive a call or contact from the media seeking a comment or information about the organization, contact your leader immediately.

Related Policies & Resources

[HR-1033-POL Communication Technology Usage](#)

[SAF-1025-POL Emergency Communication](#)

[O-1144-POL Administrator on Call Communication/Notification](#)

Social Media

In the age of social and interactive media and emerging new ways to communicate we remain committed to the basic expectation of communicating with integrity. The use of social media presents risks and carries certain responsibilities. Keep in mind that any of your conduct that adversely affects your work performance, or otherwise adversely affects others or HMC's legitimate business interests, may result in disciplinary action up to and including termination of employment.

YOUR RESPONSIBILITIES:

- Never share patient information or HMC confidential information on social media.
- Use good judgement to ensure your social media activity does not interfere with your HMC work.
- You are solely responsible for what you post online. Before creating online content, consider the risks that are involved.

Related Policies & Resources

[O-1015-POL Media Relations / Release of Information](#)

Conflict Resolution

HMC is rich and diverse in people, information, and perspectives and the nature and importance of our work can present decision making challenges, particularly in complex situations. Circumstances may arise when workforce members cannot agree on a decision or plan. This may result in tension and conflict and is a normal and inevitable part of any workplace. In such situations, workforce members should work collaboratively to resolve issues as quickly as possible. When additional resources are necessary, workforce members are encouraged to take the follow steps (these steps are further described in the Chain of Resolution policy):

Colleague to Colleague: Work directly with the parties involved in the situation to come to a mutually agreeable solution.

Supervisor/Manager: If unable to come to a mutually agreeable solution, seek assistance from your supervisor or manager, either with your colleague(s) or alone.

Department Director, Administrative or Physician Leadership: If further escalation is needed, seek assistance from the next level of leadership. Assigned leadership is on call 24/7 to assist as needed and can easily be accessed through the House Supervisor.

Compliance Team, Compliance Hotline, or Human Resources: If further assistance or specific expertise is needed, contact the appropriate department. See the Contact Information section of this document for more information.

Related Policies & Resources

[C-1127-POL-RR Chain of Resolution](#)

[MS-043 Conflict Management \(Medical Staff\)](#)

Reporting and Non-Retaliation

We rely on all workforce members to bring forward their good faith concerns regarding the occurrence of a violation of the Code or any organizational policy, standard, or law, or any adverse event or potential harm involving a patient. It is important for all workforce members to feel safe in raising these concerns. HMC prohibits retaliation and will take disciplinary action against anyone that penalizes, excludes, or harasses someone who has reported concerns honestly and in good faith.

YOUR RESPONSIBILITIES:

- If you see something, say something! Speak up right away if you have a question or concern regarding any legal, compliance or ethical issues -- before a situation becomes a violation of the Code or the law.
- Report to your leader (direct supervisor or manager) if you see or hear about a business practice or other relationship that you think may be illegal, improper, violates the Code, the Compliance Program, an organizational policy or standard, or otherwise places HMC or the people we serve at risk. You should not suffer any penalty, retribution, discrimination or adverse employment action for honestly reporting any known or suspected concern.
- If you are uncomfortable or if it is inappropriate to report your concern to your supervisor, contact the executive leader of your department. If you are not comfortable with that, you can call the Compliance Hotline.
- The Compliance Hotline is available 24 hours a day, 7 days a week (see Contact Information below). The hotline is intended to supplement, not replace, other channels for communicating questions and concerns within the organization.
- For additional alternatives for reporting concerns, please see the Contact Information section below. You may also have options to report to law enforcement, government regulators and organizations that represent workplace interests.
- Do not retaliate against anyone who raises a concern in good faith, files a complaint or participates in an investigation. Be aware that anyone involved in inappropriate activity (including retaliation) will be subject to corrective action.
- If you believe you have experienced retaliation for reporting a concern in good faith, contact Human Resources or the Compliance Team.

Related Policies & Resources

[HR-1059-POL Discrimination and Harassment - Prohibited Behavior](#)

[HR-1078-POL Non-Retaliation: Prohibited Behavior](#)

[HR-1058-POL Conduct and Corrective Action Plan](#)

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Contact Information

Contact Information

Compliance Hotline:

Contact the Compliance Hotline if you:

- Witness or hear about behavior not consistent with the Code.
- Witness or hear about patient privacy concerns.
- Are facing sanctions, exclusion or debarment from any program.
- Are convicted of a crime.

Phone: 844-450-1617 | Email: hcintegrity@ohsu.edu | Website: tuality.ethicspoint.com

Employee Health:

Contact Employee Health if you:

- Have workplace health and safety concerns.

Phone: 503-681-1444 | Email: employee.health@tuality.org

Human Resources

Contact Human Resources if you:

- Need help understanding the Code.
- Witness or hear about behavior not consistent with the Code.
- Are facing sanctions, exclusion, or debarment from any program.
- Are convicted of a crime.
- Have faced unlawful discipline, discrimination, or retaliation.
- Have questions about your professional reporting duties.
- Need assistance with making a concern or if you are not sure who to contact.

Phone: 503-681-1856 | Email: askhr@tuality.org

Information Technology Group (ITG):

Contact ITG if you:

- Need to report phishing, suspicious activity, hardware and software issues.

Phone: 503-681-1097

Medical Staff Office

Contact the Medical Staff Office if you:

- Have questions about your professional reporting duties.
- Have questions about the Medical Staff Bylaws.

Phone: 503-681-1193

Security Services

Contact Security if you:

- Need to report suspicious behavior or if you feel a workforce member, patient, or visitor is creating an unsafe environment.

Phone: 503-681-1082

