

To: UWHCA Board of Directors
From: Daniel J. Weissburg, JD, CHC,
Director of Compliance

For Consideration at April 7, 2010 Meeting: Two Minor Revisions to the Code of Conduct

In May, 2008 the UWHCA Board of Directors approved a new Code of Conduct applicable to UWHC Staff Members.

Two minor revisions to that Code of Conduct are requested.

1. As adopted in 2008, the Code of Conduct included text regarding UWHC's mission, vision and values as then enunciated. The mission, vision and values have been revised attendant to the recent creation of a UW Health-wide strategic plan. Text regarding mission, vision and values need not be a component of the Code of Conduct, and we request that the Board approve the removal of that text. Please note that both UWHC's Code of Conduct and enunciations of UW Health's shared mission, vision and values are sometimes effectively communicated in conjunction, and this practice may continue. By approving the removal of text regarding mission, vision and values from the Code of Conduct, the Board will facilitate future revisions of both, on independent schedules.

2. We request the Board approve an expansion of the section of the Code of Conduct presently titled "Promote a positive work environment." The new title of that section would be "Promote a positive work environment and culture of safety that supports teamwork and respect for others," and new, broader text appears below. This change is requested in response to new standards recently promulgated by the Joint Commission which require hospitals to include language of this sort in their Code of Conduct.

UWHC Code of Conduct (April, 2010)

Application of UW Hospital and Clinic's Compliance Program

Our Compliance Program applies to all activities performed by UW Hospital and Clinics "Staff Members" including medical staff, GME trainees, students, vendors, contractors, employees (including full time, part time, per diem, and temporary employees), agency and traveler staff, volunteers and other staff of UWHC. All Staff Members are obligated to incorporate the Code of Conduct into their daily performance.

Our Commitments

We co-operate with and support our Code of Conduct by committing the necessary resources to ensure compliance:

- We educate ourselves so we know the laws and policies that apply to our operations.
- We report suspected wrongdoing and cooperate with investigations.
- We know internal corrective action will be taken if we do not follow laws and that unlawful activities must be reported.

We know everyone is responsible for making sure we observe high standards of ethical behavior.

- **Obey the Federal Health Care Program laws:** We are committed to full compliance with the laws and regulations that apply to our operations, including all Federal Health Care Program (including Medicare and Medicaid) requirements, and are committed to prepare and submit accurate claims consistent with such requirements.
- **Neither give nor receive any kickbacks or prohibited gifts or favors:** We follow UW Hospital and Clinics' policies regarding giving or receiving gifts or discounts from people who supply us with goods and services.
- **Obey antitrust laws:** We do not share price or wage information with competitors.
- **Obey laws relating to government and donor contacts:** We conduct all political activities and contacts with government officials according to law and requirements of a non-profit, tax exempt entity. This means we do not permit political fund-raising or lobbying activities by individuals acting in their official roles representing the UW Hospital and Clinics.
- **Avoid conflicts of interest:** We understand we must avoid even the appearance of a conflict of interest by disclosing pertinent facts and exercising the best care and judgment for UW Hospital and Clinics, not for personal benefit or for the benefit of others at the expense of UW Hospital and Clinics.

Deleted: UW Hospital and Clinics is dedicated to fulfilling its fourfold mission:¶
<#>Provide safe, high-quality health care¶
<#>Educate the next generation of health professionals¶
<#>Conduct research to discover new methods of treatment and prevention¶
<#>Provide education and outreach services to the community¶
¶
Our Vision¶
UW Hospital and Clinics will be the foremost health care provider and employer in Wisconsin, serving as a statewide and national leader for patient care, education, research and community service.¶
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Our Values¶
UW Hospital and Clinics is guided in the pursuit of its mission and vision by a set of core values expressed in the word CARE:¶
<#>**Compassionate Care:** A vital part of the comprehensive, high-quality care we offer, compassionate care takes the form of listening and responding to the needs of all patients and customers.¶
<#>**Active Learning:** As an academic institution, we are committed to providing active, lifelong learning opportunities for patients, staff, students and the community.¶
<#>**Respect for Others:** We believe that people who are treated with respect will respond positively. In all interactions, we will be courteous, kind, honest and fair.¶
<#>**Excellence and Innovation:** We strive to achieve the highest standards of excellence in all we do. Expressed individually and through teamwork, our commitment to excellence is a source of pride for those associated with UW Hospital and Clinics.¶

- **Use assets wisely:** We understand the community has entrusted us with assets to be used and protected for our patients' health. We safeguard, invest and use these assets to achieve our mission. Proper use of UW Hospital and Clinics property and equipment is everyone's responsibility, and we will not misappropriate UW Hospital and Clinics property or proprietary information. In addition, we avoid waste and try to find ways to cut costs without cutting quality. We are committed to obeying software and copyright licenses and laws.
- **Carefully negotiate and bid contracts:** We fairly and accurately bid and negotiate outside contracts at an arm's length and at fair market value.
- **Work safely:** Everyone is responsible for following standard precautions in caring for patients and for helping others to do so. We will maintain a drug-free workplace and understand this means we may be subject to drug testing for cause. We report any environmental or safety hazards or concerns promptly and follow posted warnings and regulations.

Promote a positive work environment and culture of safety that supports teamwork and respect for others: We are courteous and respectful to all. Harassment, discrimination, intimidation, and retaliation are disruptive and inappropriate, can negatively impact patient care and staff morale, and we will report it. This includes discrimination based on race, color, religion, gender, age, national origin, disability, sexual orientation, citizenship, veteran status, marital status, or arrest/conviction record. Our work environment promotes competence, accountability, commitment to excellence and creative leadership.

- **Maintain confidentiality of sensitive patient information:** Our professions require that we gather a great deal of personal information about patients. Therefore, carefully avoid unwarranted invasion of patient privacy. The inappropriate release of sensitive patient information may be harmful to the patient and UW Hospital and Clinics. The inappropriate release of confidential patient or employee personnel information may be subject to civil and criminal prosecution as well as disciplinary action. You are expected to limit access to patient information and obtain appropriate release of information forms to the extent required by applicable laws.
- **Report Suspected Wrongful Conduct as Soon as Possible:** We report suspected wrongful conduct, including suspected violations of any Federal Health Care Program requirements or of our own policies and procedures, either by directly reporting such violations to the Director of Compliance or his/her designee or by calling the Compliance Help Line. The Compliance Help Line can be used anonymously to disclose to our Director of Compliance or some other person who is not in the disclosing individual's chain of command, any identified issues or questions associated with our policies, practices or procedures, including but not limited to those with respect to a Federal Health Care Program believed to be a potential violation of criminal, civil or administrative law. We will not tolerate any threat of or actual retribution or retaliation for making a good faith report of suspected wrongful conduct. All reports will be kept confidential, investigated if necessary, and all relevant information will be obtained from the

Deleted: <#>Promote a positive work environment: We are courteous and respectful to all. Harassment or discrimination is totally unacceptable and we will report it. This includes discrimination based on race, color, religion, gender, age, national origin, disability, sexual orientation, citizenship, veteran status, marital status, or arrest/conviction record. ¶

disclosing individual and proper follow-up conducted. The Director of Compliance, or his or her designee, shall maintain a confidential disclosure log, which shall include a record and summary of each disclosure received, the state of the respective internal reviews, a summary of findings and any corrective action taken in response to the internal reviews. Your reporting of suspected wrongful conduct in good faith as soon as you become aware of it is important.

- **Understand that UW Hospital and Clinics Takes Compliance Very Seriously:** Individuals engaging in wrongful conduct, including the failure to comply with our policies and procedures and all Federal Health Care Program requirements or failure to report such non-compliance, may be subject to counseling or sanctions which may lead to suspension, termination, or other disciplinary action. UW Hospital and Clinics and individual Staff Members who engage in improper conduct also are subject to various significant criminal and civil sanctions for non-compliance, including imprisonment, large money penalties, and exclusion from Federal Health Care Programs and all other Federal procurement and non-procurement programs.

STAFF MEMBER RESPONSIBILITIES

UW Hospital and Clinics expects all Staff Members to:

- Live the Mission, Values and Vision of UW Hospital and Clinics.
- Read and understand the Code of Conduct.
- Think compliance.
- Act responsibly.
- Obey all applicable legal and regulatory requirements as well as UW Hospital and Clinics policies and procedures.
- Participate in training.
- Respect the rights of UW Hospital and Clinics patients, families, and Staff Members.
- Maintain confidentiality.
- Report suspected violations of the law and the Code of Conduct.