

Our Lady of Lourdes Health Care Services, Inc. and Affiliates

**POLICY NUMBER:** AS0003CCP

**NURSING CODE:** \_\_\_\_\_

**PAGE NUMBER:** 1 of 4

**TITLE:** Corporate Compliance Code of Ethics Statement

**ACCOUNTABILITY:**

President and Chief Executive Officer

**OBJECTIVES:**

**RELATION TO MISSION:**

Our Lady of Lourdes, a Catholic Health System dedicated to its Franciscan Tradition of serving all, will demonstrate the value of **Integrity** by fostering an ethical and moral environment where the behavior of associates is positively impacted by the services of the Corporate Compliance Program and this Code of Ethics Statement.

**RELATION TO OPERATION:**

The Corporate Compliance Program is intended to reinforce the commitment of the Board of Trustees and Senior Leadership to sound ethical practices and moral behavior and to minimize instances of improper conduct by individuals throughout Our Lady of Lourdes Health Care Services, Inc. and Affiliates (OLLHCS, Inc.).

**POLICY:**

- 1) OLLHCS, Inc., its trustees, officers, managers, directors, associates, medical staff, house staff, contractors, volunteers, students and others conduct patient care and other business operations in an ethical manner consistent with the mission, vision, values, strategic plan and policies contained in the Administrative Policy Manual.

OLLHCS, Inc. has adopted a Code of Ethics as an expression of its identity as a Catholic Healthcare Organization and on behalf of the people it serves. A general framework for this

*NOTE: ANY PRINTED COPY OF THIS POLICY IS ONLY AS CURRENT AS OF THE DATE IT WAS PRINTED; IT MAY NOT REFLECT SUBSEQUENT REVISIONS. REFER TO THE ON-LINE VERSION FOR THE MOST CURRENT POLICY. USE OF THIS DOCUMENT IS LIMITED TO LOURDES HEALTH SYSTEM STAFF ONLY. IT IS NOT TO BE COPIED OR DISTRIBUTED OUTSIDE THE INSTITUTION WITHOUT ADMINISTRATIVE PERMISSION.*

Our Lady of Lourdes Health Care Services, Inc. And Affiliates

**POLICY NUMBER:** A0003CCP  
**NURSING CODE:** \_\_\_\_\_  
**PAGE NUMBER:** 2

**TITLE:** Corporate Compliance Code of Ethics Statement

code can be found in the *Ethical and Religious Directives for Catholic Health Care Services*, the codes of ethics of the various professional groups working within OLLHCS, Inc., applicable state and federal laws, as well as other documents. Specific guidelines for the code, which are summarized below, can be found in the above mentioned documents as well as in the following documents: patient and associate rights policies; billing policies; marketing policies; admission, transfer, and discharge policies; and conflict of interest policies. Also addressed in this code are procedures that should be followed in the event ethical conflicts or uncertainties arise.

**2) Rights and Responsibilities Policies:** Policies support the rights of the people we serve to ask and be informed about the existence and nature of the business relationships between the health system, educational institutions, other healthcare providers, payors, or networks that may influence treatment and service. Based in the dignity enjoyed by every human being, the rights of the people we serve are respected. Every effort is made to help the people we serve and their families understand and exercise their rights and responsibilities. The people we serve are the primary decision makers in their own healthcare decisions and, to the extent possible, information regarding diagnosis, treatment, research options, and prognosis is provided in language they can understand.

Outpatient, rehabilitative and ancillary services for the people we serve also safeguard their respect, dignity, autonomy, positive self-esteem, and civil rights, and assure their involvement in all aspects of care. This safeguarding of the involvement of the people we serve includes taking account of their perceptions of their strengths, weaknesses, resources, and relevant demands of their environment(s) both within and without the healthcare setting.

**3) Criteria for Developing New Services or Acquiring New Technologies:** OLLHCS, Inc. provides those services that are compatible with its mission and values. New services and technologies are evaluated based on criteria related to this mission and these values. The following criteria are also used to evaluate new services and technologies: safety, efficacy, efficiency, cost, experience, availability from other sources, number of individuals who benefit, and the effect on OLLHCS, Inc.'s ability to provide other needed services as well as the competence and qualifications of the staff required to provide those services or technologies in question.

**4) Associate Rights Policies:** It is the policy of OLLHCS, Inc. to value associates, their well-being and their satisfaction; to respect the differences and diversity of its associates; and not to discriminate on the basis of race, creed, color, religion, national origin, disability, age, gender, veteran status or sexual preference.

Our Lady of Lourdes Health Care Services, Inc. And Affiliates

**POLICY NUMBER:** A0003CCP

**NURSING CODE:** \_\_\_\_\_

**PAGE NUMBER:** 3

**TITLE:** Corporate Compliance Code of Ethics Statement

**5) Billing Policies:** The people we serve and third party payors are billed only for services actually provided. The following policies establish and implement mechanisms to help ensure that the people we serve are billed only for those services and care provided:

- a) The initial bill is accurate, includes dates of service, is produced in a timely way, and itemized if requested.
- b) The people we serve receive written notice of any balance due on the account.
- c) Questions from the people we serve or payors about charges are addressed expeditiously and courteously, and conflicts or complaints are addressed without real or reasonably perceived harassment.
- d) If the people we serve are unable to pay the balance due on their account, they are offered a fair and reasonable payment plan, customized to fit their needs.
- e) Assistance is available for those determined to be unable to pay.
- f) General credit and collection procedures are conducted according to applicable laws and regulations, and OLLHCS, Inc.'s policies.

**6) Marketing and Public Relations Policies:** OLLHCS, Inc. fairly and accurately represents itself, its services, and its capabilities to the public. Marketing practices recognize the dignity of the person, freedom of speech and assembly, and the importance of freedom of the press. Marketing materials accurately reflect those services available, the level of licensure and accreditation in place, and comply with applicable laws and regulations governing truth in advertising and non-discrimination under the Public Health Service Act and the Rehabilitation Act of 1973, and other applicable state and federal laws and regulations. Marketing associates use their best efforts to adhere to the Code of Professional Standards as adopted by the Governing Assembly of the Public Relations Society of America.

**7) Admission, Transfer and Discharge Policies:** Admission, transfer and discharges are conducted in an ethical manner and in accordance with applicable local, state and federal regulations. Admission, transfer and discharge policies are based on the need of the individual person and the ability of OLLHCS, Inc. to meet that need.

**8) Procedures when Conflicts or Uncertainties Arise:** It is recognized that ethical conflicts may arise when people who are trying to do right or realize the good either disagree or are uncertain about what constitutes the right or good. OLLHCS, Inc. has a process to resolve such conflicts.

Our Lady of Lourdes Health Care Services, Inc. And Affiliates

**POLICY NUMBER:** A0003CCP

**NURSING CODE:** \_\_\_\_\_

**PAGE NUMBER:** 4

**TITLE:** Corporate Compliance Code of Ethics Statement

**APPROVED BY:** \_\_\_\_\_  
Alexander J. Hatala, President and Chief Executive Officer

**ORIGINAL & REVISION DATE(S):** 12/19/01; 11/03/03, 09/19/06

**NEW EFFECTIVE DATE** 09/30/09

**REQUIRES REAUTHORIZATION IN:** 09/30/12

AS0003CCP  
Corporate Compliance Code of Ethics Statement