

Standards of CONDUCT



NORTON
HEALTHCARE

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A message from our EXECUTIVE LEADERSHIP

I hope you are as proud as we are to represent Norton Healthcare. All of us *are* Norton Healthcare, whether we are in the workplace or out in the community. As employees, we make a personal commitment to honor our mission to provide quality health care to all those we serve in a manner that responds to the needs of our communities and honors our faith heritage. We also agree that all of our actions are guided by our organizational values:

- Respect every person
- Set the standard for quality and caring
- Continually improve care and service
- Demonstrate stewardship of resources
- Accept accountability for results
- Succeed with integrity

As Norton Healthcare employees, we are responsible for maintaining a culture of ethics and integrity. This means we act responsibly in our daily activities with the same high standards we set for our business practices. Our behaviors should reflect a commitment to our organizational values, as well as the Norton Healthcare Standards of Conduct.

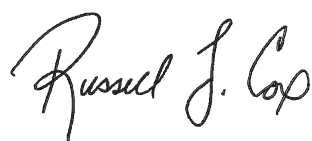
The Standards of Conduct in this booklet provide a framework for how we can reflect a commitment to quality and caring, and how to maintain a culture of ethics and integrity.

With this in mind, if you encounter a situation at work that makes you uncomfortable or if you suspect a violation of our Standards of Conduct, immediately consult with a leader or call the anonymous Integrity Line at **(866) 264-4567**.

We encourage you to report wrongdoing and assure you that you may remain anonymous when calling the Integrity Line. No acts of retaliation or retribution will occur against anyone acting in good faith who reports a perceived problem or concern.

By following the Standards of Conduct, together we can contribute to Norton Healthcare's continued reputation as a health leader in our community. Our patients, families and colleagues can feel confident when they look for the N when they need or are providing care.

Sincerely,

A handwritten signature in black ink that reads "Russell F. Cox". The signature is fluid and cursive.

Russell F. Cox
President
Chief Executive Officer

OUR MISSION, VISION, VALUES and faith history

The Standards of Conduct provide a framework to guide our behavior in supporting Norton Healthcare's mission, vision and values.

Mission

Norton Healthcare's purpose is to provide quality health care to all those we serve, in a manner that responds to the needs of our communities and honors our faith heritage.

Vision

We will be the region's most comprehensive, strongest and preferred health care organization, setting the standard for quality and caring.

Values

At Norton Healthcare, we will:

- Respect every person
- Set the standard for quality and caring
- Continually improve care and service
- Demonstrate stewardship of resources
- Accept accountability for results
- Succeed with integrity

Faith history

Norton Healthcare's faith history includes our founding organizations and other faith communities: the Episcopal Church, United Methodist Church, United Church of Christ, Presbyterian Church and Roman Catholic Church.

Purpose of our STANDARDS OF CONDUCT

Basic principles

Norton Healthcare is committed to facilitating an environment that encourages and supports everyone to do the right and honest thing. Our **Standards of Conduct** are designed to protect our tradition of strong moral, ethical and legal actions. The Standards of Conduct serve as a guide to help you perform your responsibilities ethically, lawfully and in a manner that supports our mission, vision and values.

As Norton Healthcare employees, vendors, volunteers, medical staff, contractors and designated agents, you are responsible for upholding a culture of honesty and integrity. This means acting responsibly and with the highest ethical standard in your daily activities.

Our Standards of Conduct require that you:

- Follow the law, follow the rules and be honest.
- Report violations.
- Respect everyone.
- Protect patient privacy and confidential information.
- Know patients' rights.
- Protect Norton Healthcare's assets.
- Avoid conflicts of interest.
- Keep accurate and timely records.
- Do not request gifts or gratuities.
- Do not accept certain gifts or gratuities.
- Do not engage in unlawful or unfair practices.



These basic principles are explained in detail on the following pages.

If you practice them every day and use them to guide you when deciding if something is right or wrong, you will conduct yourself in an ethical manner.

If you encounter a situation that does not feel right or if you suspect a violation of the Standards of Conduct, immediately inform a leader, contact Organizational Integrity or call the anonymous Integrity Line at **(866) 264-4567**.

Your compliance with our Standards of Conduct is a condition of your employment or other association with Norton Healthcare. Your failure to comply with these requirements will result in prompt, appropriate disciplinary action, including the possibility of termination.

Follow the law, **FOLLOW THE RULES AND BE HONEST**

Norton Healthcare employees, vendors, volunteers, medical staff members, contractors and designated agents must follow all federal and state laws for the health care industry as well as Norton Healthcare's policies and procedures.

Laws, regulations, policies and procedures

Creating and maintaining an ethical and compliant culture depends on everyone's willingness to meet the requirements of state and federal laws; comply with Norton Healthcare's policies, procedures and standards; and report compliance concerns.

As Norton Healthcare employees, volunteers, medical staff members, contractors and designated agents, you must know and follow all the legal requirements that pertain to your area of responsibility. You are expected to follow the business rules and processes as published in your departmental and system policies and procedures.

Compliance and ethics training and awareness

Norton Healthcare has a mandatory compliance and ethics training and awareness program for all employees, as well as certain other designated individuals in high-risk areas (such as billing, coding, Emergency Department). When you join Norton Healthcare, you are required to complete the initial compliance and ethics training within your first 30 days of employment. After the initial training, you are required to complete compliance and ethics training annually. The goal and objective of compliance and ethics training is to further familiarize you with the Standards of Conduct and Norton Healthcare's compliance and ethics program.

Honesty and integrity

Our actions are guided by our organizational values and our behaviors should reflect a commitment to our organizational values. At all times we must act and demonstrate integrity, trustworthiness, honesty, fairness, respect and teamwork.

REPORT violations

You should report any behavior that you suspect is illegal or that violates the standards of conduct; a law, rule or regulation; or a Norton Healthcare policy or procedure.

Some examples are:

- Patient rights and care issues
- Privacy rights of employee and patient records
- Health, safety and environmental issues
- Human trafficking
- Medicare/Medicaid fraud and abuse
- Harassment and discrimination
- Substance abuse
- Bribes and kickbacks
- Theft and fraud

How to report violations

If you have questions or concerns about an activity that you either know or suspect is illegal, immoral, unethical or does not comply with the Standards of Conduct, what should you do? You have the following options:

- Talk with a leader about your concerns.
- Contact Organizational Integrity. You have several ways to report your concern to Organizational Integrity. You may:
 - › Call **(502) 420-4170** and ask to speak to the compliance officer or to schedule a meeting.
 - › Email **NHCIntegrity@nortonhealthcare.org**.
 - › **Write a letter and mail it to:**
Compliance Officer
Norton Healthcare
4965 U.S. Highway 42, Suite 1600, N-27
Louisville, KY 40222
- Contact the anonymous Integrity Line at **(866) 264-4567** or scan the **QR code** to visit the My Compliance Report website. The confidential Integrity Line operates 24 hours a day, 7 days a week. It is run by an outside organization and staffed with operators who are professionally trained to handle your concerns. Through the Integrity Line, you can file an anonymous report. No identification methods (such as caller ID) are used. You will receive an identification number so you can follow up on your report and still remain anonymous.
- You may contact these other Norton Healthcare resources, as appropriate:
 - › Human Resources Department: **(502) 446-5800**
 - › Legal Services Department: **(502) 420-2171**
 - › Risk Management Department at the following facilities:

Norton Audubon Hospital: (502) 636-7118	Norton King's Daughter's Health: (812) 801-0752
Norton Brownsboro Hospital: (502) 446-8092	Norton Medical Group: (502) 272-5016
Norton Children's Hospital: (502) 629-3502	Norton Scott Hospital: (812) 283-2762
Norton Clark Hospital: (812) 283-2762	Norton West Louisville Hospital: (502) 632-8288
Norton Hospital/Norton Healthcare Pavilion: (502) 629-8149	Norton Women's & Children's Hospital: (502) 893-1212
	Norton Cancer Institute and CPA Lab: (502) 272-5031



Protecting your identity

You may ask questions or report suspected unethical situations to the compliance officer or to the Integrity Line without disclosing your identity. If you do provide your name, Norton Healthcare will protect your identity to the extent possible.

Protecting you from retaliation

Norton Healthcare relies on you to use these resources to ensure a safe and comfortable environment for all employees and patients. You run no risk of disciplinary action or termination when you, in good faith, report information and attempt to do the right thing.

False reports

Any employee who makes an intentionally false report will be subject to disciplinary action, up to and including termination of employment.



RESPECT everyone

Norton Healthcare is committed to fostering an environment where all individuals — whether working or receiving care — treat one another with courtesy, dignity and respect. At all times, you should behave in a professional and cooperative manner.

Patient relations

Our primary concerns are the well-being, comfort and dignity of our patients. You are expected to treat all patients with dignity and respect. Similarly, patients, their family members and visitors are expected to refrain from disrespectful behavior. If a patient, his or her family members or visitors exhibit disrespectful behavior, inform your leader.

Intimidating and disruptive behavior

We expect that you will not act in an intimidating or disruptive manner. Intimidating and/or disruptive behaviors undermine our culture of safety by leading to preventable adverse outcomes, and they contribute to poor patient satisfaction. Intimidating and/or disruptive behaviors will not be tolerated. These behaviors include overt actions such as verbal outbursts and physical threats, as well as passive activities such as refusing to perform assigned tasks or quietly exhibiting an uncooperative attitude during routine activities. If you have been the recipient of or have witnessed a Norton Healthcare employee or representative exhibiting intimidating or disruptive behavior, inform your leader or the Human Resources, Legal Services or Organizational Integrity department. You also may report it through the anonymous Integrity Line.

Abusive and harassing behavior

We all must work together to provide employees and patients with an environment that is free of unwanted sexual or physical contact, verbal abuse, and unauthorized use of controlled substances and alcohol. You should immediately report abusive behavior to Human Resources, the Legal Services Department or the Integrity Line. Employees who raise concerns and make reports may do so without fear of punishment or retaliation.

Discrimination

Do not discriminate. Norton Healthcare is an equal opportunity employer and treats all patients, visitors, employees and applicants in an unbiased and nondiscriminatory manner. You should immediately report discriminatory actions to Human Resources, the Legal Services department or the Integrity Line. Employees who raise concerns and make reports may do so without fear of punishment or retaliation.

Protect patient privacy and **CONFIDENTIAL INFORMATION**

The Health Insurance Portability and Accountability Act (HIPAA) Privacy and Security rules are national standards designed to protect data and determine who may see, use or obtain patients' protected health information (PHI), also referred to as patient medical information or patient information. All employees and those acting on Norton Healthcare's behalf are required to follow the HIPAA privacy and security rules.

You may use or disclose PHI, also referred to as patient medical information or patient information, only when needed for the purposes of patient care, payment for services and Norton Healthcare operations. The federal government may fine health care providers who improperly use or disclose PHI.

HIPAA privacy and security rules

Remember the following rules concerning PHI:

- **USE** reasonable care to prevent the unauthorized use or disclosure of PHI/patient information.
- **DO NOT** leave reports or other documents that contain PHI/patient information accessible or visible to unauthorized people.
- **LOCK** the computer or log out of any program that contains patient information before leaving a workstation unattended.
- **DO NOT** transmit PHI/patient information through any communication system (such as email, texts, social network posts) that does not have the proper Norton Healthcare safeguards.
- **ASK THE PATIENT** before discussing health information when a family member or friend is present. When a patient is incapacitated, see policy 8177, "Use and Disclosure of Patient Information to the Patient's Family, Other Relatives or Friends for Involvement in the Patient's Care and for Notification," for guidance.
- **ACCESS** a patient's information ONLY to provide treatment, obtain payment or perform Norton Healthcare operations related to your assigned duties.
- **COMPLETE** Norton Healthcare's privacy and security training.
- **PROTECT** and promote patient privacy in your work setting.
- **SPEAK QUIETLY** when discussing a patient's condition with family members in a waiting room or other public area.
- **AVOID** using patient names in public hallways and elevators.
- **DIRECT** patients and co-workers who have privacy complaints to the privacy officer at **(502) 420-4170** or call the anonymous Integrity Line at **(866) 264-4567**.
- **DIRECT** patients who have questions about their privacy rights (such as medical record review, amendment, restriction, copies) to Health Information Management at **(502) 629-8766**.
- **KNOW** Norton Healthcare's Notice of Privacy Practices. It is a core document concerning HIPAA's privacy regulations. It is available at the registration desk in all facilities and on **NortonHealthcare.com** by clicking on the Privacy Policy link at the bottom of the homepage and then selecting the HIPAA link.
- **UNDERSTAND** Norton Healthcare's HIPAA privacy policies, particularly policies 8167, "Use and Disclosure of Patient Information – General Policy," and 8171, "Use and Disclosure of Patient Information Minimum Necessary Standard." The policies are available under Policies & Forms on **Nsite**.
- **PROTECT** your passwords. Never share them with others.
- **BE AWARE** of phishing scams.
- **DO NOT** click links from or provide patient information to unknown sources.

Recognizing and protecting confidential information

Norton Healthcare employees and anyone acting on the organization's behalf must safeguard Norton Healthcare's confidential information. Do not disclose any confidential information without the proper authorization. This includes information about Norton Healthcare's patients, employees, physicians, financial status, internal operations and other proprietary information.

Media matters

Speaking with media outlets

A Norton Healthcare representative will answer questions from newspapers, television and radio stations, and other news media when information is appropriate for public knowledge. Members of the news media must receive prior approval from the Marketing & Communications Department before visiting any Norton Healthcare facility for the purpose of research, interviews, photography or videotaping. A Marketing & Communications staff member must accompany members of the media while they are at a Norton Healthcare facility.

If you receive a request for information or an interview from the media, let your leader know so that they may contact the Marketing & Communications Department. You **may not** speak to the media on behalf of your facility or Norton Healthcare unless you are asked to do so by a member of the Marketing & Communications Department.

Posting on social media

When using social media at work, do so responsibly, appropriately and in moderation. Social media use should not interfere with your duties at Norton Healthcare and should be in line with Norton Healthcare's policies governing computer usage. Generally, you should not engage with patients or patients' family members on social media. It is important to remember that you **cannot**:

- Disclose patient information.
- Post photographs of patients.
- Claim to represent Norton Healthcare unless you are authorized to do so.
- Use Norton Healthcare logos, branding or email addresses unless you are authorized to do so.
- Disclose any confidential, proprietary or sensitive information regarding Norton Healthcare, its patients, employees or vendors.
- Post photographs or images of patient information, records or other patient-related data.
- Use social media to criticize Norton Healthcare employees or patients individually.

Any of the above actions may cause you to be subject to discipline, including termination.

For more information, see policy 6607, "Social Media," under Policies & Forms on **Nsite**.

Know PATIENTS' RIGHTS

Emergency care

Norton Healthcare will provide a medical screening examination by a physician or other qualified medical professional to any individual who comes to a Norton Healthcare hospital or is on hospital property seeking or needing evaluation of a medical condition, regardless of the individual's ability to pay. Norton Healthcare will provide medical treatment necessary to stabilize the emergency medical condition and then may arrange for an appropriate transfer only in limited circumstances by the attending physician or other qualified medical professional. For specific guidance, see policy 3771, "EMTALA Emergency Care and Transfers," under Policies & Forms on **Nsite**.

Provision of care

Patients have rights, including the right to:

- Reasonable and impartial access to medically indicated treatment
- Be informed of their health status
- Be involved in the decision-making process for themselves or by surrogate
- Access their medical record
- Know the identity of those treating them
- Receive information in a manner they can understand
- Not be subjected to procedures without their consent
- Transfer their care to another facility or provider
- An explanation of the total bill for services
- Pain management
- Present their complaints or grievances to Norton Healthcare



Protect **NORTON HEALTHCARE'S ASSETS**

Appropriate use of resources

Norton Healthcare is committed to our value of stewardship, which we follow by using our financial resources as efficiently and effectively as possible. We must be prudent buyers of goods and services, always ensuring that we get the most value for our money and that we are not wasteful.

Norton Healthcare's assets are for use in providing patient care and conducting authorized business. You should not use the organization's resources or assets, such as office equipment, computers, software, office supplies, medical supplies, company records, cash or vehicles for your personal reasons. Do not remove resources from Norton Healthcare's property unless you need them to perform your job, then return them as soon as they are no longer needed for off-site business.

You are responsible for protecting Norton Healthcare's assets and preserving resources by making sure you do not waste or misuse them. You are expected to maintain and properly operate Norton Healthcare's assets and resources.

Avoid **CONFLICTS OF INTEREST**

In your role with Norton Healthcare, you have a duty to place the organization's interests ahead of your personal interests. A conflict of interest occurs if an outside interest or activity may influence or appear to influence your ability to be objective in your decision-making, affect your job performance or result in your personal financial gain. You are expected to avoid situations in which your personal interests (a benefit to you or your family) conflict, or even appear to conflict with your responsibilities to Norton Healthcare. You must report any conflicts of interest to your leader.

Examples

The following situations could result in a conflict of interest:

- Engaging in outside employment (moonlighting) that affects your work at Norton Healthcare
- Accepting substantial gifts from a source with which Norton Healthcare conducts business
- Promoting a business in which you have a direct or indirect interest on Norton Healthcare time
- Selling items or soliciting donations at work
- Using your position to influence the hiring of a family member or close friend
- Engaging in political activities at work
- Accepting offers from vendors to attend entertainment or recreational events
- Misusing confidential information for personal gain or the benefit of others
- Serving as an officer, consultant, director or employee of an organization that competes with Norton Healthcare, or could do business with Norton Healthcare as a supplier, contractor or customer
- Hiring Norton Healthcare vendors or contractors to perform personal work for you or your family
- Endorsing or giving a testimonial for a vendor, supplier or contractor.

If you are involved in a situation or activity that could result or appear to result in a conflict of interest, speak with your leader or contact the Organizational Integrity Department for guidance.

KEEP ACCURATE AND timely records

Medical records

All care provided to a patient must be appropriately charted and documented in an accurate and timely manner. Medical records must meet the requirements of the medical staff bylaws, accreditation standards, and applicable laws and regulations.

It is particularly important that you remember that medical records are legal documents that describe the services our patients receive. They also provide supporting documentation for diagnoses and patient charges. Therefore, it is imperative that entries made in patients' medical records are complete and accurate, and that services are documented when they are performed by the person who performed them.

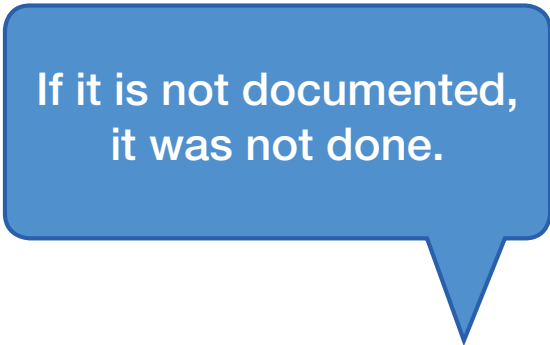
Business records

All actions and transactions, regardless of whether they are medical, financial, operational or administrative, must be accurately documented on a timely basis according to Norton Healthcare's policies and procedures, and all applicable federal and state laws, rules and regulations.

You are expected to ensure that all patient and business records for which you are responsible are accurate and completed on a timely basis. Never falsify, conceal or cover up a material fact in the performance of your duties. Failure to record information, or recording false or misleading information will not be tolerated.

Billing records

Norton Healthcare will bill only for care and services ordered and provided for our patients. We will not do anything that violates federal and state false claims laws and regulations. Examples of false claims include billing for services not rendered or that are known to be false or medically unnecessary.



**If it is not documented,
it was not done.**

Do not request or accept CERTAIN GIFTS OR GRATUITIES

What you may accept

Under certain circumstances, you may accept an unsolicited, nonmonetary gift of nominal value from a business, vendor or individual doing business or seeking to do business with Norton Healthcare. Gifts of more than nominal value may be accepted if protocol, courtesy or other special circumstances exist, as sometimes happens with large transactions.

For specific guidance, see policy 5925, "Conflicts of Interest in Professional and Business Practices – Employee," under Policies & Forms on **Nsite**.

What you may not accept

You may not accept a gift of money under any circumstances. Furthermore, you may not request or solicit nonmonetary gifts, gratuities or any other personal benefit or favor from any kind of supplier, vendor or customer.

If someone wants to make a substantial gift or donation to Norton Healthcare, call the Norton Healthcare Foundation at (502) 420-4299.



Do not engage in **UNLAWFUL OR UNFAIR PRACTICES**

No kickbacks

Do not offer a payment or provide any kind of benefit in exchange for referring a patient to a Norton Healthcare facility. Federal and state antikickback laws prohibit any person or entity from offering or accepting compensation or anything of value for the referral of patients and/or health care business.

Federal law is strict regarding kickbacks. It is very important to be sure that any activity or transaction that you enter into does not violate federal antikickback statutes. If you are not sure, contact the Legal Services Department or Organizational Integrity Department for guidance.

No bribes

You may be in a position to influence decisions related to patient referrals, the purchase of goods and services, or the release of confidential information. If you are in this kind of position, you are prohibited from offering, soliciting or accepting anything — such as gifts, discounted products or services, or money — that could affect your decision or cause you to act in an unethical manner.

No price fixing

Antitrust laws and trade regulations exist to promote competition, to preserve free enterprise, and to protect Norton Healthcare and other companies from unfair trade practices.

When conducting business on behalf of Norton Healthcare, you may not act in a way that violates antitrust laws by authorizing, directing or approving unfair practices such as price fixing, supplier boycotts or bribery. Do not enter into any understanding or agreement (written or oral) that unlawfully reduces or eliminates competition, or that sets prices or divides markets with a competitor.

MISCELLANEOUS

Political activities

You may not contribute or donate Norton Healthcare items or services to any political candidate. You may make voluntary personal contributions with your own money on your own time.

Research grants

If you work with research grants and have the power to make decisions, you must make sure any funds provided to support clinical research projects are put toward the appropriate research project.

Government representatives

You may not pay for any meal, refreshment, entertainment, travel or lodging expense for a government employee or representative.

Mandatory disclosures

Violations of federal criminal law affecting any federal award or funding will be reported to the U.S. Department of Health and Human Services by Organizational Integrity or Legal Services in accordance with federal requirements.

Summary

By adhering to these values, we earn our patients' trust, because they easily can see that we are committed to our community's health and well-being. If you encounter a situation that does not feel right or if you suspect a violation of our Standards of Conduct, let your leader know or contact Human Resources, Risk Management, Legal Services or Organizational Integrity directly. If you prefer, you may call the anonymous Integrity Line at **(866) 264-4567**.

