

POLICY TITLE: CODE OF CONDUCT AND CERTIFICATION
APPROVED BY: COMPLIANCE COMMITTEE
ORIGINATED BY: COMPLIANCE OFFICER
REVIEWED/REVISED: 1/2012; 10/02/2012; 10/01/2013; 10/01/2014; 10/08/2015

Key Points

- This Policy applies to The Christ Hospital and all of its wholly-owned subsidiaries (collectively, “TCH”).
- This Policy explains general duties of Covered Persons under the TCH Code of Conduct (“Code”) and the process for Covered Persons to acknowledge compliance with the Code.

Definitions

Covered Persons includes:

1. Owners, officers, directors, and employees;
2. Contractors, subcontractors, agents, and other persons who provide patient care items or services or who perform billing or coding functions on behalf of TCH excluding vendors whose sole connection with TCH is selling or otherwise providing medical supplies or equipment to TCH and who do not bill the Federal health care programs for such medical supplies or equipment; and
3. Physicians and other non-physician practitioners who are members of TCH’s active medical staff.

Notwithstanding the above, the term Covered Persons does not include part time or per diem employees, contractors, subcontractors, agents, and other persons who are not reasonably expected to work more than 160 hours per year, except that any such individuals shall become Covered Persons at the point when they work more than 160 hours during the calendar year.

Policy

1. **General Duty.** All Covered Persons shall abide by the Code and are obligated to report promptly any violations or suspected violations of the Code. The Code has been approved by the Board of Directors and provided to each Covered Person. Copies of the

Code may be obtained from the Division of Compliance & Organizational Ethics, Human Resources, the Medical Staff Office, or the TCH Intranet.

2. **Certification.** All Covered Persons are required to sign (whether hard-copy or electronically) a Certification Form within thirty days after becoming a Covered Person. All Covered Persons are required to sign the Certification Form again within thirty days following any substantive changes in the Code of Conduct. By signing the Certification Form, the Covered Person attests that he or she has received, read and understands the Code and agrees to abide by the Code and report any issues or conduct which he or she suspects violates the Code, TCH policies, or any Federal health care program requirements.
3. **Disciplinary Action.** Failure to sign the Certification Form shall result in termination, or revocation of privileges.
4. **Revisions to the Code.** The Code will be reviewed periodically and revised as necessary based on such review. Any revised Code shall be distributed within thirty days after any revisions are finalized and each Covered Person shall sign the Certification Form within thirty days after the distribution of the revised Code that he or she has received, read and understands the revised Code and shall report any issues or conduct which he or she suspects violates the Code, TCH policies, or any Federal health care program requirements.
5. **Records Retention.** The Compliance Officer shall conduct periodic audits and/or monitoring to assure that Certification Forms are kept on file in accordance with any applicable TCH policies on records retention and disposal.