

# CODE OF CONDUCT

THE CHILDREN'S WAY



Dear Colleagues,

As you know, Children's Health<sup>SM</sup> has a strong commitment to achieving our mission to make life better for children while in full compliance of all applicable laws, regulations and guidelines. Every team member, medical/dental staff member, vendor, contractor and volunteer associated with our system is expected to conduct themselves in a responsible, ethical and legal manner at all times.

Our Code of Conduct, available here in printed version and on *ChildNet 2.0*, is designed to help team members navigate and understand the complex rules we're required to follow in the highly regulated health care industry. It outlines standards of conduct that align with our values to follow at all times as you serve patients, their families and other organizational stakeholders. Put simply, being part of the Children's Health team means agreeing to live and work under these critical values.

It's important to remember that you have a responsibility to report actions that are not in compliance with the Children's Health Code of Conduct. The Code provides details on reporting compliance issues, including hotline numbers, and describes the Reporting Compliance Issues process for making a report in accordance with our values – selfless service, passionate advocacy, commitment to excellence and unwavering integrity.

Please take time to read the Code carefully so that you understand our organization's expectations for ethical behavior. It's one of many resources available to team members as we strive to do the right thing in all that we do to protect Children's Health, our team members, our patients and their families. To that end, we want to address any questions or concerns you have. Please discuss any questions or concerns with your supervisor, a Human Resources representative or staff member, or the Compliance Officer.

The Board of Directors and Senior Leadership Team join me in pledging to uphold the Code of Conduct, support our Compliance Program here at Children's Health and continue to foster an environment of integrity and transparency. Thank you for your commitment to making Children's Health a place where every team member feels heard and respected – and an organization we are proud to call ours.

Sincerely,



Christopher J. Durovich  
President and Chief Executive Officer  
Children's Health<sup>SM</sup>



## CONTENTS

AN INTRODUCTION TO THE CODE	3
THE CHILDREN'S WAY	4
SELFLESS SERVICE	5
PASSIONATE ADVOCACY	8
COMMITMENT TO EXCELLENCE	11
UNWAVERING INTEGRITY	15
COMPLIANCE	19
FAQS	22
DIRECT LINKS	25

# AN INTRODUCTION TO THE CODE

**Children’s Health System of Texas (“Children’s Health”) is committed to serving our patients, medical/dental staff, applicable third parties, employees and the community in an ethical and responsible manner, as well as in a manner consistent with the Children’s Health Code of Conduct.**

Furthermore, Children’s Health is committed to providing all services in full compliance with all applicable laws, regulations and guidelines, as well as our own policies and procedures. We are particularly sensitive to those requirements applicable to federal and state health care programs and the submission of accurate claims for services.

The Code of Conduct (“the Code”), as well as statutes, regulations, guidelines, policies and procedures at Children’s Health, must apply to and be observed by all Staff (defined as employees, contract labor, medical/dental staff, members of the Board of Directors, anyone participating in training and anyone else engaged in our work environment or acting on behalf of Children’s Health). No one, regardless of position, will be allowed to compromise adherence to the Code, statutes, regulations, business standards, policies or procedures.

Failure to comply with the Code, policies, procedures, laws, regulations and guidance can result in serious damage to our standing in the community, regulatory action against Children’s Health and against the Staff, including disciplinary action up to and including immediate termination or revocation of clinical privileges.

If there are any questions or concerns regarding the Code or any Compliance policies or practices at Children’s Health, please contact the Compliance Office or the Compliance Hotline at **1-866-769-0998**. This is an anonymous hotline for any compliance concerns or questions monitored by an outside company trained to assist you in reporting concerns.

The Code of Conduct adopted by Children’s Health is intended to help us meet our ethical and compliance goals in a highly regulated business environment. The Code is designed to provide you general guidance and does not replace the policies and procedures of the organization. If there is no specific policy or procedure, the Code standard becomes the policy or procedure. If a policy and a standard of conduct conflict, the standard of conduct becomes the policy. In seeking additional guidance and direction regarding the Code, Staff are encouraged to refer to the organization’s pertinent Policies and Procedures. In addition, the Code supports the values that Children’s Health stands for: **selfless service**, **passionate advocacy**, **commitment to excellence** and **unwavering integrity**.

The Code is a **“living document”** that will be updated periodically in response to changing conditions. Thus, Children’s Health reserves the right to modify or terminate any or all of these provisions at any time. If Children’s Health finds credible evidence of alleged misconduct, and after a reasonable inquiry there is reason to believe that the alleged misconduct may violate criminal, civil or administrative law, or the organization’s policies and procedures, Children’s Health will immediately conduct an investigation to validate the concern and determine what further action may be required, including reporting the matter to the appropriate government authority.

# THE CHILDREN'S WAY



## SELFLESS SERVICE

SERVING OTHERS WITH AN ENTHUSIASTIC SPIRIT

- Transcends the ordinary and exceeds expectations
- Engages with all in a respectful, non-judgmental manner
- Treats others with kindness, humility and dedication
- Recognizes and celebrates the contributions of others



## PASSIONATE ADVOCACY

STANDING AS CHAMPIONS FOR CHILDREN

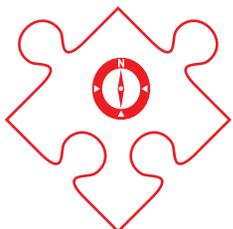
- Acts courageously on behalf of children
- Educates the community about the needs of children
- Understands and honors different perspectives and expectations



## COMMITMENT TO EXCELLENCE

DRIVING INNOVATION AND QUALITY CARE TO MAXIMIZE OUTCOMES

- Collaborates to achieve exceptional quality, safety and continuous improvement
- Innovates to transform possibilities into realities
- Advances knowledge, applies evidence-based best practices and takes ownership of professional development
- Continuously seeks opportunities to be better stewards of the organization's resources



## UNWAVERING INTEGRITY

CREATING AN ENVIRONMENT OF TRUST THROUGH HONESTY,  
TRANSPARENCY AND AUTHENTICITY

- Do the right thing even when no one is looking and regardless of the personal impact
- Willingly shares information with others
- Speaks up with ideas and concerns
- Holds oneself and others accountable for decisions behaviors, actions and results

SELFLESS SERVICE



[JUMP TO FAQs](#)

| [BACK TO CONTENTS](#)



## SELFLESS SERVICE

SERVING OTHERS WITH AN ENTHUSIASTIC SPIRIT

### GENERAL GUIDELINES

We will exercise good faith and fair dealings in all transactions that involve our responsibilities to Children's Health.

We will, as long as we have a relationship with Children's Health, conduct business to the best of our ability for the benefit and interests of Children's Health. We play a vital role in preventing fraud, waste and abuse. Conducting ourselves ethically, staying informed of Children's Health's policies and procedures, and keeping an eye out for key indicators of potential fraud, waste and abuse. We have a duty to report concerns.

We will protect patients and the funding of governmental health care programs by abiding by laws and regulations.

We will report any actual or perceived conflict of interest to Compliance.

We will not use our position with Children's Health for personal gain.

We will maintain unbiased relationships with actual and potential vendors and contractors.

We will complete a Conflict-of-Interest form annually to report all outside employment in which we are involved.

We will not use Children's Health resources, patient information or equipment to conduct outside employment. We will not engage in outside employment while on Children's Health time. Please refer to **AD 9.04 Appropriate Use Policy** for further guidance.

### FAMILY MEMBERS, FRIENDS OR BUSINESS ASSOCIATES

We will avoid situations where the Staff or a related party (e.g., family member, friend or business associate) receives a benefit from any decision or action taken by the Staff member.

### FINANCIAL INTERESTS

We will report any direct or indirect financial interest (except minor interest in publicly traded securities) in any business that supplies Children's Health with a substantial number of goods or services or where sales to Children's Health constitute a substantial part of the supplying company's business.

When we create financial relationships with physicians, we need to be mindful of laws and regulations. Essentially, any time team members give a physician something of value, such as a pen, mug or meal, they may create a financial relationship between the physician and the organization. When we create financial relationships with physicians, we implicate the Stark Law and cannot bill Medicare for DHS referrals by them unless we meet an exception in the statute or regulations.

We will protect patients and the funding of governmental health care programs by abiding by laws and regulations regarding the exchange of or offer to exchange anything of value in an effort to reward the referral of business reimbursable by federal health care programs (e.g., Medicare).

Children's Health has developed procedures regarding Business Courtesies provided to a Physician or his or her Immediate Family Members and to incorporate relevant guidance issued by the Centers for Medicare & Medicaid Services ("CMS") and the U.S. Department of Health and Human Services Office of Inspector General with respect to certain activities that may potentially implicate the Stark Law and Federal and State "anti-kickback" statutes.

Refer to **AD 4.07.01 Business Courtesies to Physicians and Immediate Family Members Policy** and **AD 1.08 Conflict of Interest Policy** for further guidance.

We will not use information that comes to us in the course of our work for personal investment or gain, nor will we provide that type of information to members of our family or others.

We, as Staff or agents of Children's Health, will not contribute financial or other support to political candidates, organizations or parties as part of our official duties or solicit such activity in the workplace.

This limitation does not preclude any agent or Staff member from exercising their personal political support outside of Children's Health. Children's Health policies prohibit solicitations of any kind on our premises.



PASSIONATE ADVOCACY



[JUMP TO FAQs](#)

| [BACK TO CONTENTS](#)



## PASSIONATE ADVOCACY

STANDING AS CHAMPIONS FOR CHILDREN

### PRIVACY

We will honor the privacy of patients and not reveal or discuss patient-related information except with health care personnel that are authorized and involved in their care, payers and others authorized by the parent or his/her authorized representative to review patient information.

### CONFIDENTIALITY OF INFORMATION

We will maintain the confidentiality of quality improvement, peer review and health care services review information in accordance with laws and regulations.

We will protect confidential corporate information and not use or reveal such information except in the proper performance of duties.

We will maintain complete and accurate patient medical records and keep all such information confidential.

We will comply at all times with the **Health Insurance Portability and Accountability Act of 1996 (“HIPAA”)** and Children’s Health policies addressing the HIPAA regulations related to the privacy and security of patient protected health information.

We will require that confidential patient information is accessible only by health care personnel involved in the patient’s care and others authorized to review patient information.

### PROTECTION OF ASSETS

We will maintain inventory (as appropriate/required) and keep all supplies secure.

We will adequately safeguard, use and care for all property and equipment entrusted to us, including mobile devices such as cellphones, laptops and pagers.

We will report the loss or theft of all property or equipment entrusted to us in a timely manner to our supervisor.

We will dispose of all surplus or obsolete property and equipment according to established policies and procedures.

## SECURITY OF INFORMATION

We will maintain all medical and business records in accordance with laws and our record retention policies.

We will not alter or falsify information on any record or document.

We will release patient records in accordance with the hospital's policies.

We will prohibit the making of unauthorized copies of computer software or the use of personal software on computer equipment belonging to Children's Health.

We will not knowingly communicate or transfer any information or documents to any unauthorized persons.

We will not use computers, email, facsimile machines or any other technology to communicate information to unauthorized people. Further, the use of technology to send offensive, discriminatory or harassing messages is prohibited.

We will use computers, the email system, the Internet, the Children's Health intranet and other technology only for work-related purposes.

We understand all information sent, received or stored in the email system is the property of Children's Health.

## RESEARCH

We will conduct all research activities to the highest ethical standards and in compliance with all applicable federal, state, and local laws and regulations.

This includes the fair and honest presentation and analysis of data, the proper acknowledgment of all contributors, and compliance with all federal and state laws or regulations, as well as all Children's Health policies related to the protection of all human subjects and/or animals.



COMMITMENT TO EXCELLENCE



[JUMP TO FAQs](#)

| [BACK TO CONTENTS](#)



## COMMITMENT TO EXCELLENCE

DRIVING INNOVATION AND QUALITY CARE TO MAXIMIZE OUTCOMES

### DUTIES AND RESPONSIBILITIES

We have a duty at every level of the organization to maintain our integrity, ethics and the quality of our job performance. We have a duty and responsibility to promptly address any deficiency or error by reporting it to a supervisor, department director, **Compliance Department**, **Chief Compliance Officer** or **Children's Health Compliance Hotline** who can assess the problem, take appropriate action (through the event reporting or grievance process) and follow the problem to resolution. We have a duty and responsibility to employ, grant medical/dental staff privileges to or contract with only fully licensed and properly credentialed providers with the expertise and experience to care for our patients.

### PATIENT RIGHTS

We will affirm and uphold the rights of our patients and their parents, guardians or authorized representatives. This includes Children's Health obligations under the Emergency Medical Treatment and Labor Act (EMTALA) to ensure public access to emergency services regardless of ability to pay.

### CARE DELIVERY

We will encourage all Staff and applicable third parties to continually evaluate existing methods of delivering services in order to discover more effective ways of serving our patients.

We will periodically assess and evaluate the goals and objectives established for medical care and related services provided in order to deliver services according to current standards of practice and the most current knowledge in the field.

We will require that admissions, transfers and discharges are medically appropriate and in accordance with all legal requirements.

### HEALTH AND SAFETY

We shall comply with all safety and health requirements, whether established by management; federal, state or local laws; or our accrediting organizations.

We will promptly report any accidents involving injury to a Staff member, applicable third party or visitor through the event reporting process. **SafeLink** is the Children's Health's comprehensive system for all reporting. Report safety events, near misses, precursor events, good catches, patient family complaints, grievances and compliments, safety-related observations, moments of excellence, team member injuries and more.

We will take all reasonable precautions and follow all safety rules and regulations to maintain a safe environment for our patients, Staff, applicable third parties and visitors.

We will strive to create a violence-free workplace where all employees, patients, patient families and visitors feel welcomed and safe and are treated with respect, compassion and kindness regardless of age, race, beliefs, ethnicity, religion, culture, language, physical or mental disability, socioeconomic status, sex, sexual orientation, and gender identity or expression. It is our utmost priority to ensure the safety of everyone on Children's Health campuses by strictly enforcing zero tolerance for Workplace Violence or Threats. This includes but is not limited to Harassment, Intimidation, Verbal or Physical Threats, Physical Attack, Family/Domestic Violence, Property Damage or Weapons. Refer to **EOC 6.02 Workplace Violence Policy** for further guidance. We are responsible for inspecting the work area under our control for potential health and safety risks, eliminating or reporting such risks to the safety officer (or designee), being familiar with health and safety procedures, and training ourselves in health and safety.



### **Drug-Free Workplace**

Children's Health has established processes to maintain a safe and healthy work environment for our patients, employees, volunteers and visitors by preventing the abuse, misuse or diversion of drugs or alcohol on the premises of Children's Health and preventing any staff member from being at work while impaired by drugs (illegal or prescribed), alcohol or illness. The manufacture, sale, possession, distribution or use or misuse of drugs or alcohol at work will not be permitted. Reporting to work while under the influence of drugs or alcohol will not be tolerated. We will safely store, secure and count all drugs and pharmaceuticals and medical supplies. Missing or diverted drugs will be promptly reported through the event reporting process. Please refer to **HR 3.08 Drug-Free Workplace: Reasonable Suspicion, Impairment and Drug Diversion Management Policy** for further guidance.

### **DIVERSITY, EQUITY AND INCLUSION**

At Children's Health, we represent a broad and diverse population of patients, team members and local communities. We embrace and value as many voices and perspectives as possible and strive to create opportunities for every team member to engage, develop and advance their careers. To that end, we have two dedicated departments and many team members working together to create a workplace where these three strategic imperatives are practiced with excellence. Our approach is data-driven, people-centric and aligned with the strategic goals of the organization. We aim to be the employer of choice for diverse talent. Refer to the **Diversity, Equity and Inclusion SharePoint** page for further guidance.

### **Remote Work**

Children's Health has developed processes to define expectations and requirements for employees whose jobs have been designated as remote. This policy describes the considerations and requirements for remote work, which is established at the discretion of Children's Health and may be modified or terminated at any time with or without notice. Please refer to **HR 5.07 Remote Work Policy** for further guidance.



### **ENVIRONMENTAL LAWS**

We will comply with all applicable environmental laws.

## HAZARDOUS MATERIALS AND WASTE

We will follow all laws and regulations regarding the disposal of medical waste and hazardous material.

We will promptly handle all spills or accidents involving medical waste or hazardous materials and take action immediately to help prevent further harm/damage.

We will provide training in safe work practices to eliminate hazards and correct unsafe behavior to protect the health and safety of Staff and others.

## GENERAL

We will treat everyone with fairness, dignity and respect.

We will strive to provide an environment for all individuals free from harassment and intimidation.

We will not tolerate verbal or physical harassment, including sexual harassment.

We will continually strive to build confidence and professionalism in every individual.

We will work to maintain open lines of communication so that the views of each individual may be considered, and their opinions given proper respect.

We shall apply the Code of Conduct and policies and procedures equally to all, regardless of their position at Children's Health.

We will encourage each individual to continuously evaluate existing methods of delivering services in order to discover more effective ways of allocating resources for patient care and support services.

When caring for patients, we will maintain professional boundaries, treat all families equally and show all families care and respect.

We will require that all Staff and applicable third parties who are providers of patient services are properly licensed and trained prior to providing services.

We will provide reasonable training opportunities to assist the Staff in building and maintaining professional skills.

We will require that our Staff are hired, trained, promoted and compensated on the basis of personal competence and potential for advancement without regard for race, color, sex (including pregnancy, sexual orientation and gender identity), national origin, age or disability, as well as any other classifications as required by law. We shall review and evaluate each Staff member's performance periodically in an objective, consistent and uniform manner.

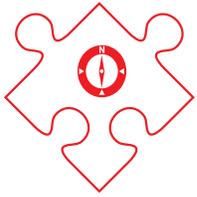


UNWAVERING INTEGRITY



[JUMP TO FAQs](#)

| [BACK TO CONTENTS](#)



## UNWAVERING INTEGRITY

CREATING AN ENVIRONMENT OF TRUST THROUGH HONESTY,  
TRANSPARENCY AND AUTHENTICITY

### IN ACCORDANCE WITH THE LAW

When any possible violation of law, regulation or policy has occurred, we will promptly report it to the appropriate Children's Health team member or resource. Please refer to the **Reporting Compliance Issues** section in the appendix for further guidance.

All compliance issues or reported concerns will be acted upon in a fair and truthful manner. Any retaliation or other negative action against a Staff member who in good faith reports a suspected violation will not be tolerated.

- We will require that all Staff and applicable third parties provide internal and outside auditors with any and all information required for the performance of their responsibilities. Refer to the **AD 1.25 Non-Retaliation-Protection of Whistleblowers Policy** for further guidance.
- We will bill payers and patients according to all applicable laws, regulations and policies.
- We shall not hire or contract with individuals who have been sanctioned by the OIG or barred from federal or state procurement programs. Please refer to **HR 9.09 Background Screening, MD 1.22 Background Screening and AD 1.26 Exclusion List Checking Policies**.
- We will require that all drugs and other controlled substances used in treatment are maintained, dispensed and transported in compliance with all applicable laws and regulations. We will comply with all requirements of the Emergency Medical Treatment and Active Labor Act (EMTALA).
- We will adhere at all times to Children's Health policies regarding the acceptance of gifts and/or courtesies. Children's Health defines the process regarding the acceptance or provision of reasonable business and professional courtesies to comply with applicable legal requirements and ethical standards. We will not provide kickbacks, bribes, rebates or anything else of value in order to influence the referrals of patients or business transactions. Please refer to **AD 4.07 Business Gifts and Professional Courtesies Policy** for further guidance.
- We will comply with all anti-corruption laws that apply to Children's Health operations, including the Foreign Corrupt Practices Act (FCPA). When dealing with Foreign Officials, you are prohibited from giving, offering or authorizing the provision of anything of value to a Foreign Official in order to obtain or retain business.

### ETHICS

We will strive to provide patient care and enter into any business dealings in an ethical manner, not only in conjunction with this Code but also with any and all professional organizations' Codes of Conduct, as appropriate.

## RESPONSIBILITIES OF OUR FINANCIAL OFFICERS

**Financial officers** are responsible for certifying the accuracy of financial statements that bear their signatures. By their signature, they attest to the following:

- They have reviewed the report.
- Based upon the officer's knowledge, the report does not contain any untrue statement of a material fact, nor does the report omit material facts necessary to ensure the report is not misleading.
- Based upon the officer's knowledge, the report fairly represents financial statements and other financial information presented in the report.

Our financial officers are responsible for establishing, maintaining, testing and reporting on the effectiveness of internal controls within their assigned areas.

Our financial officers are responsible for disclosing to auditors and the Board significant deficiencies in internal controls and fraud involving management or Staff with significant internal control responsibilities.

## BILLING

We will charge and bill only for services that are actually provided and documented in the patient's medical records.

We will not knowingly submit for payment or reimbursement a claim we know to be false, fraudulent or fictitious.

We will conduct general collection/credit procedures according to the Fair Debt Collection Practices Act.



### **CODING**

We will assign diagnostic and procedural codes that accurately reflect the services that were provided. Upcoding, unbundling or any other means of artificially enhancing reimbursement is unlawful and strictly prohibited.

### **CLAIMS AND RECORD KEEPING**

We will require that all claims for services submitted to any insurance program or payer, Medicare, Medicaid or other federally funded health care programs are accurate and correctly identify the services ordered and performed.

We will maintain all records in a secure location for the period of time required by law. The premature destruction or alteration of any document in response to, or in anticipation of, a request for those documents by any government agency or court is strictly prohibited.

### **COST REPORTS**

We will comply with all laws and regulations related to government cost reports. All questions or issues related to cost reports will be promptly reported to the Chief Financial Officer or the Compliance Officer.



COMPLIANCE



[JUMP TO FAQs](#)

| [BACK TO CONTENTS](#)

# REPORTING COMPLIANCE ISSUES

Children's Health is committed to serving our patients, medical/dental staff, applicable third parties, team members and the community in an ethical, legal and responsible manner. **To report a question, concern or potential violation**, please engage the appropriate Children's Health team member or resource from the list below.

- **DISCUSS** the issue with your supervisor
- **SPEAK** to your department leader or human resources representative
- **CONTACT** the Compliance Office by emailing [ChildrensComplianceOffice@childrens.com](mailto:ChildrensComplianceOffice@childrens.com) or visiting the [Corporate Compliance Page](#).
- **REPORT** the issue by calling the **Compliance Hotline at 866-769-0998**

Non-Retaliation Policy: Retaliation is against Children's Health policy and against the law. Children's Health will not tolerate retaliation against any employee who reports actual, potential or suspected misconduct. Refer to **AD 1.25 Non-Retaliation-Protection of Whistleblowers Policy**.

## Quality of Care Concerns

In addition to the reporting compliance issues process, any individual who provides care, treatment and services is free to raise concerns to the Joint Commission and/or Texas Department of Health and Human Services when Children's Health has not adequately prevented or corrected problems that can have or have had a serious adverse impact on patients, without fear of disciplinary or punitive action. You are encouraged to report and escalate as necessary any concerns about safety or quality of care provided by the hospitals within Children's Health. The Joint Commission's direct phone number is **800-994-6610**.

We recognize that there are times when you may have questions or concerns that cannot be addressed through the reporting compliance issues process. When this happens, please use the Compliance Hotline. The Compliance Hotline operates 24 hours a day, seven days a week, and it is run by an independent, third party. The Hotline is designed to protect your confidentiality and your anonymity.

**The Children's Health Compliance Hotline may be reached 24 hours a day, seven days a week at 1-866-769-0998\*.**

\*Caller can choose to make an anonymous report.

## Compliance at Children's Health is made up of the following elements:



### Standards and Procedures

The Code of Conduct, in addition to Children's Health policies and procedures, was created to ensure that all Staff are in compliance with federal, state, and local laws, rules and regulations.



### Program Oversight

Children's Health has appointed a Chief Compliance Officer to oversee the strategic direction, implementation and operation of the Compliance Program. The Chief Compliance Officer reports to the Audit and Compliance Committee of Children's Health System of Texas. In addition, Children's Health has established an Executive Compliance Committee, which is a standing hospital committee to assist in the implementation and oversight of the Compliance Program.



### Staff Training and Education

Children's Health has defined expectations for employees and non-employees regarding initial and ongoing regulatory training requirements. Refer to **AD 1.31 Regulatory Training and Education** for further guidance.



### Communication

Each employee is responsible for promptly reporting potential violations of law, regulation or our standards, guidelines or policies. You are protected from retaliation if you make a good-faith report, complaint or inquiry.



### Enforcement and Discipline

All Children's Health Staff are required to adhere to the Compliance Program, which includes all policies and procedures and the Code. If any Staff violates any of these items, they may be disciplined up to and including termination or revocation of clinical privileges.



### Monitoring and Auditing

Children's Health has established a program to continuously monitor and audit compliance with federal, state, and local laws, rules and regulations, and to report any audit results as necessary to senior leadership.



### Response and Prevention

All reports or concerns of suspected non-compliance will be investigated to determine whether a material violation of law or the requirements of the Compliance Program has occurred, and if so, steps will be taken to correct the problem.

FAQS



| [BACK TO CONTENT](#)

# FAQS

## GENERAL

### **A friend of mine just had their child admitted to Children’s Health. Can I look up the status of the patient?**

You may not access the patient’s medical records for personal reasons; this is a HIPAA Violation.

### **Can I use my Children’s Health-issued laptop for my outside activities?**

Children’s Health assets and resources are not to be used for any outside activity.

### **I received a call from a family stating that their child’s claim will not be paid by the insurance company. The family requests the code to be changed to a specific code that would be paid by the insurance company. Can I make this change?**

No, no one should ever change a code based on what insurance will pay if the documentation in the medical record does not support the code.

## BUSINESS GIFTS AND PROFESSIONAL COURTESIES

### **I was offered a gift, services or opportunity from an external source. Can I accept?**

Gifts, services or opportunities that give rise to a Conflict of Interest include anything of value. Prior to accepting a gift, service or opportunity, you must report it to Corporate Compliance at [ChildrensComplianceOffice@childrens.com](mailto:ChildrensComplianceOffice@childrens.com) or via the [ad hoc link](#).

### **A vendor would like to meet with our department to discuss a new product. The vendor offers to bring lunch for staff during the meeting. Is this acceptable?**

No, vendors are not allowed to provide lunch to department staff as part of a “sales call” to market a new product.

### **A patient’s family told me that they would like to give me a \$15 Starbucks gift card since I cared for their child. Can I accept the gift card from the patient’s family?**

Cash or cash equivalents are never to be accepted by an employee for any reason other than the satisfaction of an outstanding account with Children’s Health or as a donation to the foundation. If an employee receives a gift card, this will be considered a Gift In-Kind. They are to Inform the donor that their generosity is much appreciated and will be sent to the internal team that uses the gift cards to support the mission of Children’s Health. Please review **AD 4.07 Business Gifts and Professional Courtesies Policy**.

## **CONFLICT OF INTEREST (COI)**

### **I am a Children's Health Employee, and I am thinking about working a second job for another organization. Can I have a second job outside of Children's Health?**

You must report this to Corporate Compliance at [ChildrensComplianceOffice@childrens.com](mailto:ChildrensComplianceOffice@childrens.com) or via the [ad hoc link](#). The Compliance Office will work with the leader, HR and other potential impacted leaders as appropriate to determine any next steps and to provide further guidance. To determine next steps and provide guidance, please also review AD 1.08 Conflict of Interest Policy and HR 2.03 Employment Process Policy.

### **I am a Children's Health Provider, and my friend just opened their practice. Can I refer patients to my friend's office?**

All Children's Health Employees should refrain from self-dealing and should not refer patients or families that they treat or encounter as part of their work at Children's Health to an individual practice, entity or organization where they, or a Children's Health colleague, have an external interest.

### **My immediate family member (e.g., parents, grandparents, spouse, domestic partner, significant others, children, grandchildren, and siblings (all by birth, adoption or marriage)) also works at Children's Health. Should I disclose this information?**

Yes, regardless of the department they work in, there may be factors that need to be properly vetted. You must report it to Corporate Compliance at [ChildrensComplianceOffice@childrens.com](mailto:ChildrensComplianceOffice@childrens.com) or via the [ad hoc link](#) on the COI SharePoint Site.

## **EMTALA**

### **Who does EMTALA apply to on our campuses?**

Children's Health EMTALA obligations apply to any individual, regardless of age, medical condition, ability to pay or any other discriminating factor. If any individual presents to our campus seeking emergency services, we have an obligation to evaluate their condition and provide treatment to stabilize any emergent medical condition.

### **What is my responsibility if Children's Health employees, physicians, contractors, vendors or students require emergency medical assistance?**

Assist them to the Children's Health Emergency Department and follow the EMTALA guidelines listed on your EMTALA: Say, Do, Document Quick **Reference Guide** and **Badge Buddy**.

For a full listing of FAQs and relevant policies, [please visit the Corporate Compliance site](#).



[Accreditation and Regulatory Affairs: Accreditation & Regulatory Affairs](#)

[Corporate Compliance: Corporate Compliance](#)

[Diversity, Equity and Inclusion: Diversity, Equity and Inclusion](#)

[Foundation: Children's Medical Center Foundation](#)

[Human Resources: Human Resources](#)

[Legal Affairs: Legal Affairs](#)

[Policy Administration: Policy Administration](#)

[Security: Security](#)

MAKING LIFE BETTER FOR CHILDREN

