

# Children's Healthcare of Atlanta



## STANDARDS OF CONDUCT





Dear Children's employee,

We understand that, for most of us at Children's, "doing what's right" comes as second nature. We all strive to conduct ourselves with the highest level of ethical and legal standards, but in certain circumstances may need some guidance. Children's developed the Compliance Program to help guide and remind us how we should conduct ourselves as employees of Children's.

The program includes the enclosed Standards of Conduct. The Standards, along with Children's policies and procedures, provide more specific direction on how to protect the integrity of our organization and support our System values through our day-to-day actions. They also reflect our commitment to excellence in all aspects of pediatric care. While the Standards, policies and procedures don't cover every specific situation, they do provide guidelines you can follow and apply to the situations you may encounter.

As an employee, you have an active role in Compliance. This includes becoming familiar with the Standards, upholding them and reporting any instances of potential wrong-doing, unethical or illegal behavior. You can report these to your supervisor, a Human Resources representative or the Compliance Office. You also can make a confidential report through our toll-free Compliance Connection Line, 877-373-0126 or [choa.alertline.com](http://choa.alertline.com).

Children's is committed to fostering an environment of support for all employees, so you can thrive. By following our Standards of Conduct, we are upholding our commitments to Children's, our patients and each other.

Thank you for all you do to make Children's such an extraordinary place.

Sincerely,



Donna Hyland  
President and CEO  
Children's Healthcare of Atlanta



Employees are expected to follow Children's Healthcare of Atlanta, Inc. (hereinafter "Children's") values, Standards of Conduct, policies and procedures, federal and state laws and regulations. Anyone with knowledge of a violation of the values, Standards of Conduct, policies and procedures, or laws or regulations must report this information as promptly as possible. Violations of policy including failure to report a known violation shall result in appropriate disciplinary action.

## MISSION

To Make Kids Better Today  
and Healthier Tomorrow.

## VISION

Best Care...Healthier Kids.

## VALUES

Care about People  
Passionate about Kids  
Dedicated to Better

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# Children's Standards of Conduct: At a Glance

## Our commitment to our patients and their families:

We are a safe, respectful and caring environment for patients and families, and we follow all applicable laws when providing care.

## Our commitment to our employees:

We treat every employee equitably and with mutual respect, regardless of status or position.

## Our commitment to ethical physician relations:

We maintain honest and ethical relationships with physicians, complying with all federal and state laws governing such relationships.

## Our commitment to an ethical relationship with other parties:

We do the right thing when working with other hospitals, vendors and outside parties.

## Our commitment to our competitors:

We conduct ourselves ethically at all times, only participating in fair business practices.

## Our commitment to government relationships:

We follow all laws relating to government relations and political activities.

## Our commitment to payors:

We bill government and private insurance payors accurately and ethically, following all appropriate laws and regulations.

## Our commitment to the protection of property:

We protect the property entrusted to us, including our funds and any proprietary information, against loss, theft or misuse.

## Our commitment to avoid conflicts of interest:

We will be free of influence from personal considerations when representing Children's interactions with others.

## Our commitment to prohibit retaliation, report compliance concerns and to our professional staff.

# Our Responsibility In Relationships With Patients

Children's provides a safe, respectful, and caring environment for the treatment of our patients and their families in compliance with applicable laws.

## Patient Care

- We treat our patients and their families with dignity, respect, compassion and courtesy while maintaining boundaries without regard to race, color, national origin, religion, gender or disability.
- We document the care rendered and maintain an accurate and complete patient medical record consistent with applicable law.
- We make reasonable accommodations for individuals seeking services with special communication needs to include: impaired sight, hearing or limited English proficiency.
- We provide each patient/patient legal representative with a copy of the Patient Rights.



## Patient Rights

- We employ and/or contract with appropriately licensed and/or credentialed providers with relevant training who understand the scope of their practice experience to care for our patients.
- We provide information and assistance to patients or legal guardians seeking to understand the charges for services provided.
- We do not credential or employ individuals that are or have been excluded from participating in a federally funded healthcare program or who are not licensed to perform within their scope of practice.

## Informed Consent

- We inform patients and their parents (or legal guardians) as required by law regarding treatment recommendations and alternatives and the risks associated with the care they are seeking and provide medically necessary care.

## Research

- We seek to protect the rights, health and safety of patients participating in clinical research investigations by supporting and monitoring valid and appropriate research and complying with applicable consent and human subject research laws.

## Emergency Treatment

- We provide an emergency medical exam by an appropriately qualified individual when a patient presents to the emergency department with a potential emergency medical condition.
- We do not refuse to provide emergency care to stabilize a patient based on the patient's ability to pay or based on the type of insurance coverage.

## Confidentiality

- We limit access of protected health information to people that have a need to know in order to perform their work.
- We only permit the use of cameras or video devices to take pictures of patients in accordance with Children's policies as needed for treatment or research or as specifically consented to for other purposes.

# Our Responsibility In Relationships With Physicians

Children's complies with federal and state laws governing relationships between hospitals and physicians who are in a position to refer patients to us. Laws include the federal Anti-Kickback Law and the Stark Laws, as well as the Georgia self-referral statute. Stark Laws address financial relationships between physicians and Children's.

## Contracts

- We require that contracts with non-employed physicians have a commercially reasonable purpose in furtherance of Children's charitable mission, and that all such contracts meet criteria required by applicable laws.
- We require that all compensation paid to a physician is set in advance and consistent with fair market value determinations.
- We do not take into account the volume or value of referrals by physicians when contemplating a business relationship with physicians.

## Remuneration

- We do not pay physicians and/or physician groups for referrals.
- We do not accept payment for referrals we make.

## Fair Market Value

- We require all physician compensation policies be approved by the Board or a committee appointed by the Board as to commercial reasonableness and fair market value.
- We do not provide office space, equipment, services or supplies for free or for less than fair market value to non-employed physician practices.

## Gifts

- We track the value of all gifts to non-employed physicians to assure the value does not exceed the exception under the Stark Law.



## Use of Midlevel Providers

- We assure that non-employed physician use of Children's employed midlevel providers is consistent with applicable laws to assure proper utilization and delegation of medical tasks and proper billing and collecting for the provided services.

## Proper Coding and Billing

- We require that physicians providing services to Children's properly code based on documented services and the use of the proper site of service.

# Our Responsibility In Relationships With Other Parties

Children's complies with federal and state laws governing relationships between hospitals and other parties for securing goods and services, including the Anti-Kickback Law. The Anti-Kickback Law prohibits anyone from knowingly giving or receiving anything of value in exchange for patient referrals or for purchasing, leasing, ordering, arranging for or recommending any item paid for by Medicare or Medicaid.

## Excluded Vendors

- We only do business with parties that do not appear on any of the government watch lists.

## Vendor Gifts

- We maintain appropriate business boundaries with other parties by not accepting monetary gifts, entertainment, services or other benefits that are not approved by Children's policies.
- We do not accept donations, rebates, bribes or other forms of inducement in exchange for the other party having the opportunity to gain Children's business.

## Fair Business Dealings

- We base decisions with third parties on sound business principles such as cost and quality.
- We strive to communicate our business ethics as reflected in our Standards of Conduct to vendors with whom we conduct significant business.
- We do not make payments to vendors in exchange for patient referrals or business that may be paid for by government or other third party payors.
- We do not enter into purchase arrangements where the price of one product or service is tied to or dependent on another purchase.
- We do not make direct purchases from a Children's contractor for personal use through Children's relationship with the contractor.



# Our Responsibility In Relationships With Competitors

Children's is committed to truthful and fair business practices in compliance with applicable laws including the Antitrust and intellectual property laws.

## Property Rights of Others

- We respect the intellectual property rights of others.
- We do not misuse or misappropriate confidential or proprietary information belonging to another individual or entity.

## Dealing Fairly with Competitors

- We display and distribute marketing materials that are truthful, informative and non-deceptive.
- We comply with the Antitrust laws which prohibit agreements or practices "in restraint of trade" such as price-fixing, boycotting suppliers or customers, market allocation, pricing intended to run a competitor out of business, issuing disparaging remarks, mistreating or harassing a competitor, stealing trade secrets, bribing or providing kickbacks.
- We do not try to obtain competitor's reimbursement rates or share Children's reimbursement rates with competitors unless permitted by law.
- We do not discuss sensitive or proprietary Children's information with competitors including specific pricing, compensation or expenses unless permitted by law.
- We do not share trade secrets except as may be permitted by contract or by law.



# Our Responsibility In Relationships With Government Agencies

Children's complies with all federal, state and local laws governing participation in government relations and political activities.

## Lobbying

- We are honest in all our dealings with government officials.
- We utilize Children's designated individuals to approach federal, state and local political representatives regarding Children's business operations to promote compliance with all laws regarding political contributions and gifts to government officials.

## Cooperation

- We cooperate with government agencies in audits or other types of investigations.

## Political Activity

- We do not directly contribute on Children's behalf to any individual political campaigns, political parties or other organizations which intend to use the funds primarily for political campaign objectives.
- We do not permit the use of Children's email or other corporate resources to engage in political activity.
- We do not reimburse individuals for any personal contributions to a political campaign.

## Licensure and Accreditation

- We maintain all licenses, certifications, approvals and accreditations necessary for the operation of each healthcare facility, service or department of Children's.



## Document Retention

- We store all records in a secure location for a period of time as 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.

## Hazardous Waste

- We dispose of hazardous waste material in accordance with applicable laws, regulations, policies and procedures.

# Our Responsibility In Relationships With Payors

Children's maintains processes/systems that promote and allow coding and billing claims to be submitted to government and private insurance payors that are truthful, accurate, medically necessary, and conform to federal, state and local laws and regulations. Mistakes in coding and billing, even unintentional, can have serious consequences including fines, penalties, criminal prosecution and exclusion from participation in any federally funded healthcare program.

## Fraud and Abuse

- We submit claims for payment and cost reports to Medicare, Medicaid and other federal health programs in accordance with current reimbursement rules, policies and procedures promulgated by the Centers for Medicare and Medicaid Services (CMS), the state Medicaid agency, any applicable fiscal intermediary or carrier of other agency with responsibility for the program in question.
- We do not knowingly submit for payment or reimbursement a claim, invoice, bid proposal or other document that is false, fraudulent or fictitious.
- We do not knowingly assign billing codes that inaccurately reflect the services and products that were provided.
- We do not provide compensation or financial incentives for billing department personnel (including coders) and billing consultants to submit improper claims or codes.

- We do not routinely waive insurance copayments or deductibles.

## Medical Necessity and Accurate Coding

- We bill only for services that are medically necessary, actually provided and documented in the patient's medical records.
- We do not unnecessarily admit a patient.
- We do not upcode, unbundle, or misrepresent services or other facts on the claim or encounter form.
- We repay overpayments identified within time periods specified by law or contracts.

# Our Responsibility In Protecting Children's Assets

Children's has many valuable assets, employees, property, confidential information, funds, computer technology and intellectual property. Children's is committed to protecting its property, and the property entrusted to it against loss, theft or misuse.

## Asset Protection

- We correctly use and care for Children's property entrusted to us.
- We dispose of all surplus or obsolete property and equipment according to established procedures.
- We refrain from engaging in activities that may jeopardize the tax-exempt status of the organization.
- We utilize Children's travel and expense policy when reimbursing for expenses incurred to further Children's business.
- We protect projects, discoveries, inventions, strategic plans, logos, phrases, trademarks, symbols, photographs, videos, books and software resulting from employee activities or created by Children's as intellectual property.

- We engage in activities in furtherance of our charitable purpose, and use our resources to further the public good rather than private or personal interests of any individual.
- We do not permit the making of unauthorized copies of computer software or using personal software on computer equipment.
- We do not enter into situations where personal interests are in conflict with Children's, i.e., personal, financial or other relationship or interest that could interfere or compete with Children's interests, or a position within Children's that is used for personal gain.
- We do not enter into compensation arrangements in excess of fair market value.

# Our Responsibility In Relationships With Our Employees

Children's is committed to the fair and equitable treatment of employees and encourages employees to develop their potential. Children's Values support treating fellow employees with consideration and respect, regardless of status or position.

## Harassment

- We do not permit harassment or discrimination on the basis of race, color, sex, religion, national origin, age, disability, or any other classification prohibited by law. Each allegation of harassment or discrimination is promptly investigated in accordance with applicable Human Resources policies and laws.
- We do not tolerate unwelcome sexual advances, requests for sexual favors, and other verbal or physical conduct of a sexual nature.
- We do not permit supervisors to place or seem to place pressure on subordinates that could cause them to deviate from acceptable Standards of Conduct.

## Non-Discrimination

- We do not make hiring decisions based on race, color, sex, religion, national origin, age, sexual orientation, disability, or any other status protected by law.

## Safe Work Environment

- We provide a work environment free of drug or alcohol usage. This prohibition does not apply to employees taking over-the-counter and physician prescribed medication according to direction.
- We provide a smoke-free environment for staff and patients.
- We strive to provide a safe work environment where employees are free from harassment, violence, discrimination, and intimidation. Weapons of any kind are strictly prohibited in the workplace.

## Worker Injury

- We promptly report any injuries to a Children's supervisor in accordance with applicable policies and any applicable laws and regulations.



## Protect Confidential Information

- We maintain the confidentiality of salary, benefit and other personal information relating to employees.
- We maintain employee files, payroll information, disciplinary matters and similar sensitive information in a manner designed to promote confidentiality in accordance with applicable laws.

# Our Responsibility In Relationships With Conflicts of Interest

Children's Board members, physicians and employees are expected to avoid conflicts or the appearance of conflicts between their private interests and those of the organization.

## Employees

- We avoid any activity that might conflict, or appear to conflict, with the interests of the organization.
- We report or disclose any potential conflict related to our workplace responsibilities and avoid doing business with vendors we manage.
- We exercise good faith and fair dealing in all transactions that involve our responsibilities to the organization.
- We do not accept or provide money or gifts other than those permitted by Children's policies.
- We do not allow an employee to be supervised by a relative unless properly disclosed and approved according to our applicable policies.
- We only accept or extend business courtesies that are in accordance with our applicable policy.

## Board Members, Key Employees and Physicians with Administrative Responsibilities (“Covered Persons”)

- We educate Covered Persons of their fiduciary duties to the organization(s) they serve.
- We require Covered Persons to disclose potential conflicts of interest to the organization(s) pursuant to applicable policies.



# Our Responsibility To Prohibit Retaliation

- We prohibit disciplinary action or other forms of retaliation taken against any employee for reporting an issue, problem, concern or violation to management, Human Resources, the Office of the General Counsel, the Compliance Office, the Chief Compliance Officer, the Compliance Connection Line, or online at <http://choa.alertline.com>.
- We protect employees who report directly to the federal or state government under this non-retaliation policy, provided that the employee's actions do not create a non-compliant situation or event.

# Our Responsibility To Report Compliance Issues

- We encourage employees who wish to report a concern, issue, problem or violation to communicate such concerns to:
  - his or her supervisor or other member of the management team;
  - Campus Human Resources;
  - the Office of the General Counsel;
  - the Compliance Office;
  - the Chief Compliance Officer;
  - the Compliance Connection Line;
  - online at <http://choa.alertline.com>.
- Children's recognizes that there may be times when concerns cannot be properly addressed through the normal chain of command or other avenues. When such situations arise, employees are encouraged to contact the Compliance Office, the Compliance Connection Line or report online at <http://choa.alertline.com>.
- The Children's Compliance Connection Line may be reached at 1-877-373-0126 and is available 24 hours a day, 7 days per week.

# Our Professional Staff Responsibility

- Professional staff members are expected to comply with all provisions of Professional Staff Bylaws, Policy on Appointment, Reappointment and Clinical Privileges, Rules and Regulations, as well as Hospital bylaws, applicable Hospital policies and procedures, the standards of The Joint Commission and Children's Standards of Conduct.
- Any Professional Staff member with knowledge of a violation of the Standards of Conduct, Children's policies and procedures, or laws and regulations should report this information to his or her Service Chief/Medical Director, Campus Human Resources, the Office of the General Counsel, the Chief Medical Officer, the Compliance Office, the Chief Compliance Officer, the Compliance Connection Line or report online at <http://choa.alertline.com>.



# STANDARDS OF CONDUCT

## Acknowledgement Form

I certify that I have reviewed the booklet entitled "Children's Healthcare of Atlanta Standards of Conduct" and agree to adhere to Children's Healthcare of Atlanta's values and standards. I understand that I have the right to report any good faith concerns of fraud and abuse directly to a governmental agency without fear of retaliation. I pledge to report any known violation through the established reporting process at Children's.

.....  
Signature

.....  
Position

.....  
Printed Name

.....  
Employee ID Number/Vendor/Contractor/Volunteer

.....  
Date

.....  
Department





## Notes

## Notes





For more information or to report violations:

Call the Children's Compliance Connection Line at 877-373-0126.

Callers to the Children's Compliance Connection Line can remain anonymous.

OR

Visit [choa.alertline.com](http://choa.alertline.com). An independent company operates this website.