

OUR CODE OF CONDUCT

The Governing Document for the Halifax Health
Corporate Ethics and Compliance Program



HALIFAX HEALTH

halifaxhealth.org

Table of Contents

Statement of Understanding.....	3
Letter from the President	4
Code of Conduct - Purpose	5
We Are a Governmental Entity.....	6
We Are Also a Tax-Exempt Organization	6
Ethical Behavior	6
Documentation and Record Retention	6
Generate Accurate Billing and Claims.....	7
Carefully Bid, Negotiate, and Manage Contracts	7
Decline Inappropriate Gifts	8
Solicitation and Distribution in the Workplace	9
Steer Clear of Conflicts Of Interest	9
No Political Activity or Lobbying is Allowed	9
Be Concerned With the Integrity of Contractors	9
Remain Aware of Physicians’ Compliance Requirements.....	10
Ineligible Entities and Individuals May Not Work for Halifax Health	10
Manage Controlled Substances and Other Pharmaceuticals	10
Comply With Copyright Laws	10
Intellectual Property	10
Promote a Positive Work Environment	10
Work Safely: Protect Yourself and Your Fellow Team Members	11
Patient Information: Privacy and Security	11
Avoid Anti-Competitive Activity	11
Government and Media Inquiries	12
Protection and Proper Use of the Organization’s Assets	12
Quick Checklist	12
Good Faith Reporting	12

Statement of Understanding

1. I acknowledge that I have received, read, understood and shall abide by the Halifax Health (HH) Code of Conduct.
2. I will familiarize myself with this material, and I understand that I am responsible for knowing and adhering to the principles and standards in the Code of Conduct.
3. I have a duty to report any suspected violation of the Code of Conduct to management or a member of the Compliance Committee.
4. I have not been convicted of, or charged with, a criminal offense related to health care.
5. I have not been suspended, debarred or otherwise excluded from participation in Federal health care programs.
6. I understand that a violation of the Code of Conduct may be grounds for disciplinary action, up to and including discharge.
7. At this time, I am not aware of any possible violation of the Code of Conduct, except as noted below (attach additional sheets, if needed; anonymous reports can be made by calling 844.251.1880).

Physician Relationships: *To help Halifax Health comply with regulations pertaining to financial relationships with physicians, please indicate if you are related to a physician as a spouse, relative, in-law or step-child, -parent, -grandparent, -brother or -sister:*

Name(s) of physician(s)

Relationship to you

Confidential Information

Initial here _____

Team members must safeguard all confidential information with which they are entrusted. We may never discuss such information outside of Halifax Health. In particular, team members must protect the privacy of our patients, and the confidentiality of all information related to their care. This includes any past, current or future medical condition. Personal information about patients, fellow team members, medical staff and others with whom we do business should not be used or disclosed except with the consent of the person or as allowed by law. Wrongful use or disclosure of personal medical information is a serious offense and may result in termination of employment and legal action.

Use of Electronic Systems

Initial here _____

Computer access codes (credentials) such as user IDs and passwords are never to be shared with anyone, written down, saved to a file or saved in any form that could be compromised. Team members are not to sign in or use any other's credentials. Compromised credentials must be reported to a supervisor or the IT Service Desk immediately. All information is to remain with Halifax Health and is not to be removed, emailed, texted or in any way distributed to anyone outside of Halifax Health. Team members must not use IT devices outside their job responsibilities. Team members are only to access information needed for their job. All email must be reviewed prior to opening to determine if the email is malicious. Files are not to be stored locally on any IT device. Mobile Iron is the mobile device solution and Vocera is the text messaging solution used at Halifax Health. No other solutions will be used to message or send emails on mobile devices. All IT equipment is owned by Halifax Health and assigned to users. Equipment must be returned to the Service Desk at termination or when no longer needed.

Signature

Date

Printed Name

Team Member ID Number

Position

Department

A Message from Our Chief Executive Officer

Dear Fellow Team Members,

We are committed to fulfilling our mission of serving the health needs of the citizens of our service area. Additionally, Halifax Health is committed to conducting our business in accordance with all applicable laws and regulations. In recognition of these responsibilities, we have developed our Code of Conduct as part of the Halifax Health business philosophy.

The Code of Conduct summarizes the virtues and principles that guide our actions in providing outstanding patient care and serves as a “quick” reference guide to assist you in performing your job responsibilities.

If you ever have a question or concern regarding the Code of Conduct, or encounter any situation you believe may violate its provisions, please immediately consult your supervisor.

If for any reason your concern is not completely addressed to your satisfaction, contact the Halifax Health - Compliance office at 386.425.4278. You may also call the Compliance Hotline at 1.844.251.1880 or at halifaxhealth.ethicspoint.com. You may report concerns anonymously and without fear of retaliation.

Your conduct is a reflection on you and Halifax Health. Your cooperation in following these Standards will assist us in our journey to be the best patient-centered health care system in Florida.

Sincerely,



Jeff Feasel

President and Chief Executive Officer

Code of Conduct

Purpose

The Code of Conduct provides guidance to Halifax Health Team Members, medical staff, business partners and volunteers to assist them in carrying out their daily activities while complying with appropriate ethical and legal standards. These standards govern our relationships with patients, third-party payers, contractors, vendors, consultants, and our Team Members.

Halifax Health is committed to ethical and legal conduct. Policies and procedures have been created and are available on the intranet (*PULSE*) to address many legal and regulatory requirements and protect against fraud, abuse, and waste.

Each member of the team has an obligation to report good faith concerns. No adverse action will be taken for those who report concerns in good faith.

We Are a Governmental Entity

Halifax Health is a special district created by the Florida legislature for the purpose of delivering health care services to the community. The Board of Commissioners convenes at publicly noticed meetings and maintains records open for public inspection. Halifax Health Team Members are considered public employees and must follow Florida laws governing topics such as bidding (the “Enabling Act”) and public records (Government in the Sunshine).

We Are Also a Tax-Exempt Organization

As a tax-exempt organization, we will conduct ourselves in compliance with Internal Revenue Service regulations specific to us, including avoiding inappropriate private benefit.

Ethical Behavior

- › Patients: We are committed to providing Exceptional Service, to every patient, every day. We will comply with Federal and State regulations and The Joint Commission’s standards regarding clinical care delivery.
- › Team Members: We are committed to providing a safe and healthy working environment.
- › The communities where we live and work: We are committed to acting as concerned and responsible neighbors, reflecting all aspects of good citizenship.
- › Team Members, Medical Staff, agents, and contractors must self-disclose health program exclusion, debarment, suspension, or conviction of a health program related crime. If you need to make a disclosure, please contact the Compliance Officer.

Documentation and Record Retention

Halifax Health will maintain complete and accurate records. Records will be retained in accordance with applicable laws and relevant accounting standards, including the Florida Records Retention Schedule.

Generate Accurate Billing and Claims

We will generate billing and claims that accurately reflect the services rendered. Claims must be supported by documentation that follows payor requirements.

We will:

- › Submit accurate Cost Reports
- › Appropriately represent services on claims for reimbursement
- › Bill for services provided in accordance with payor requirements
- › Use only approved treatments or equipment
- › Assign appropriate codes to claims
- › Bill for tests that have been appropriately ordered and performed
- › Ensure that physician relationships are appropriate in light of laws and regulations
- › Grant discounts based on approved policies and to the extent allowed by law and regulation

If you become aware of a claim that needs to be corrected, call the billing department immediately to get the correction processed.

If you become aware of the submission of improper, false, fictitious, or fraudulent claims, it is your obligation to report this immediately to your supervisor. You may also call the Halifax Health - Compliance office at **386.425.4278** or, if you wish to remain anonymous, you may call our Compliance Hotline at **1.844.251.1880** or at **halifaxhealth.ethicspoint.com**.

Carefully Bid, Negotiate, and Manage Contracts

If you are involved in proposals, bid preparations, or contract negotiations, you must be certain that all statements, communications, and representations to potential partners or suppliers are accurate and truthful. Once awarded, all contracts must be performed in compliance with the contract.

If you buy goods or services for Halifax Health or are involved in the procurement process, you must treat all suppliers uniformly and fairly. In deciding among competing suppliers, you must objectively and impartially weigh all facts and avoid even the appearance of favoritism. Established routines and procedures should be followed in the procurement of all goods and services. In some instances, a formal bidding as proscribed by the Enabling Act may be required.

Decline Inappropriate Gifts

Since Halifax Health is a public institution, the conduct of its Team Members is governed by the Florida Code of Ethics for Public Officers and Employees. Public employees are prohibited from soliciting or accepting anything of value that might influence the performance of official duties. Guidance for some of the more common gifts is addressed below.

Tips and Gratuities

If a patient or family member offers cash, it should be declined. If the giver insists on providing the monetary gratuity, the employee should inform the giver that Halifax Health policy requires cash to be donated to Halifax Health - Foundation (386.425.4111).

Merchandise of a nominal value, less than \$50, may be accepted from patients and family members. Examples of merchandise include items such as food, candy, or flowers. If the value of the merchandise exceeds \$50, inform the giver that the merchandise will be given to Halifax Health - Auxiliary or to Halifax Health - Foundation. If there is a question regarding the value of the merchandise, discuss it with your supervisor or contact Halifax Health - Compliance at 386.425.4278.

Gifts from Vendors

Public employees may not ask for, or accept, anything of value, (such as a gifts, loans, and rewards, promises of future employment, favors, or services) in exchange for preferential treatment.

Occasional gifts from vendors that are nominal are allowed as long as the gift is not cash or cash equivalents (for example, gift cards are considered to be equivalent to cash) and the gift does not influence your business decisions. If there is a question whether the gift is not consistent with the Code of Conduct, assume that it does and refuse the gift.

Meals Paid By Vendors

An occasional vendor-paid meal is acceptable as long as Halifax Health business is discussed or the vendor provides education (for example, the benefits of a new item and how it would help our patients). Provision of the meals shall not be so routine in nature as create the appearance of impropriety. Meals shall not be solicited.

You may not solicit gifts of any kind from vendors, patients or any other person.

Refuse Bribes, Kickbacks, and Inappropriate Referrals

- › DO NOT offer anything of value (cash or any other valuable) to a government agent or representative;
- › DO NOT accept anything of value (cash or any other valuable) from someone in exchange for favorable treatment;
- › DO NOT accept referrals from providers whose relationship with Halifax Health is known to not satisfy relevant laws and regulations;
- › DO NOT refer patients or services to providers whose relationship with Halifax Health is known to not satisfy relevant laws and regulations.

Solicitation and Distribution in the Workplace

Unless it is for a Halifax Health or Halifax Health Affiliate sponsored event, Halifax Team Members and visitors may not solicit for any purpose. Additionally, Team Members and visitors may not distribute literature that has not been approved in writing by Administration for any purpose in any area.

Steer Clear of Conflicts Of Interest

It is your responsibility to act in the best interest of Halifax Health at all times. When performing your job, avoid any relationship, influence, or activity that might impair, or even appear to impair, your ability to make objective and fair decisions.

Examples of potential Conflicts of Interest:

- › Accepting gifts, payment, or services from those seeking to do business with Halifax Health.
- › Purchasing goods or services on behalf of Halifax Health from a firm owned or controlled by an employee or a close relative of an employee.
- › Ownership of, or substantial interest in, a company that is a competitor or supplier.
- › Acting as a consultant to Halifax Health's customer or supplier.
- › Working for a competitor or potential competitor while employed by Halifax Health.

If you are a Physician, a Manager or above, you need advanced, written permission from your leader for a second job. If you are not a manager, you do not need written permission, but it is recommended that you discuss the second job with your supervisor to ensure it will not interfere with your duties at Halifax Health.

No Political Activity or Lobbying is Allowed

As a special taxing district and tax-exempt organization, there are laws and regulations prohibiting the use of Halifax Health resources and facilities for certain political or lobbying purposes. Do not campaign or solicit campaign contributions for candidates for political office on Halifax Health's premises or using Halifax Health's email or other information systems. Contact Halifax Health - Legal Services for direction prior to permitting or engaging in activity at work that may be perceived as political in nature.

Be Concerned With the Integrity of Contractors

Business integrity is a key principle for the selection and retention of Halifax Health contractors. Those engaged to act on behalf of Halifax Health, such as agents, representatives, or consultants, must comply with Halifax Health's policies and procedures, and perform in a way that conforms to Halifax Health's values and ethics, including the Code of Conduct.

Remain Aware of Physicians' Compliance Requirements

Federal and State laws governing providers' ability to participate in government health programs. Physicians and other Team Members who are found to have violated such laws are subject to removal from the Medical Staff and termination of employment.

Ineligible Entities and Individuals May Not Work for Halifax Health

Halifax Health routinely performs exclusion reviews to ensure Team Members, Board Members, vendors, and physicians are eligible to participate in Federal healthcare programs.

Manage Controlled Substances and Other Pharmaceuticals

We will comply with all regulations governing the management and distribution of controlled substances. No one affiliated with Halifax Health will illegally distribute any controlled substance, including prescription drugs.

In addition, expired, adulterated, or misbranded pharmaceutical drugs may not be distributed or diverted. All suspected diversions and thefts are to be reported to your supervisor, the Pharmacy Manager or to Clinical Risk Management using the Occurrence Reporting System.

http://hsvrlidincl/ems_prod_30/

Comply With Copyright Laws

Halifax Health complies with U.S. Copyright laws. Individuals affiliated with Halifax Health may not reproduce any copyrighted work in print, audio, video, computer software, or other electronic form in violation of the Copyright laws. Examples include printed articles from publications, TV and radio programs, music performances, photographs, Web pages, software programs, CD, DVD, and audio/video tapes.

Intellectual Property

Halifax Health invests substantial resources in developing proprietary intellectual property, such as creative works produced by Team Members. Halifax Health is considered the legal author and owner of the work product.

Promote a Positive Work Environment

Halifax Health is committed to providing equal opportunity and consideration to all persons regardless of age, gender, gender identity, race, color, national origin, religion, or disability and will not tolerate discrimination or harassment. Any individual who has concerns about this matter should discuss the concerns with their Supervisor or Human Resources.

Work Safely: Protect Yourself and Your Fellow Team Members

Team Members must report to work free of the influence of alcohol, illegal drugs, or impairment by prescription medications. Firearms, other weapons, explosive devices, or other dangerous materials are prohibited on Halifax Health premises. Workplace violence will not be tolerated. On-the-job injuries or other environmental or safety concerns should be brought to the immediate attention of your supervisor.

Patient Information: Privacy and Security

The Health Insurance Portability and Accountability Act (HIPAA) requires providers to keep patient information Secure and Confidential.

- › Only share patient information with those who have a legitimate need for the information to do their job (for example, the physician treating the patient);
- › Patients (including patients who are Team Members) may go to the Health Information Management (HIM) department to request copies of their records;
- › Keep your computer passwords secret;
- › Do not discuss patients on social media or with people who are not involved with the care of the patient;
- › Do not discuss patient information in public areas such as elevators, hallways, and other open, public spaces;
- › Log off your workstation when you walk away from the computer;
- › You may NOT access your own medical records (or those of friends/ family members) you may request the medical records through the HIM department; and,
- › Check every page before you hand paper to a patient or anyone else to ensure you do not give patient information to the wrong person.

Avoid Anti-Competitive Activity

You may not restrain competition (examples include boycotting suppliers, discussing pricing or patients with competitors, implementing unfair or deceptive business practices, and misrepresenting services). Violations may result in severe penalties for Halifax Health and the individuals responsible for the violations. If you are involved in any dealings with physician groups, suppliers, or competitors, you should consult with Legal Services prior to negotiating or entering into any arrangement.

Halifax Health policies provide that before any written contract is signed, the Legal Services department must review the contract. Our policies also provide direction and control regarding the negotiation of contracts and define those authorized to sign contracts.

Government and Media Inquiries

If you receive an inquiry from the Government, discuss the inquiry with Legal Services so a proper response can be made. If a representative of a governmental Agency asks you for an interview or makes a non-routine request for documents, you should immediately contact Halifax Health - Legal Services so that appropriate arrangements can be made to fully comply with Halifax Health's legal obligations. All media inquiries should be referred to Marketing Communications Department.

Protection and Proper Use of Halifax Health's Assets

All Team Members should protect Halifax Health's assets and promote their efficient use. Halifax Health's assets should be used for legitimate business and medical purposes. Misuse of assets should be reported to your supervisor. Theft of assets should be reported to the Safety/Security Department.

Quick Checklist

When in doubt, ask yourself . . .

- › Is this a Safe decision?
- › Is this a Compassionate decision?
- › Am I using resources Efficiently?
- › How would this decision look as a newspaper headline?

If you are still in doubt or need clarification, discuss the situation with your supervisor, any member of the Compliance Committee or you may call the Compliance department at 386.425.4278.

a list of Compliance Committee members is on *PULSE* at https://pulse.halifaxhealth.org/portal.aspx?bo=b6portal.wo&start=Dir*c=1031542

Good Faith Reporting

You may report concerns without fear of retaliation for good faith reporting. Good faith reporting means you honestly have concerns about an issue or situation that you feel Halifax Health should be aware of. Good faith reporting does not include making reports using fabricated information or information known to be false.

Team Members have an obligation to the Organization to report issues or concerns to the appropriate level of authority, based on the nature of the matter. Issues or concerns may be reported to your supervisor, any member of the Compliance Committee, any member of Leadership, to the Compliance Officer, to the Compliance Department or using the Compliance Hotline at 1.844.251.1880 or at halifaxhealth.ethicspoint.com.



HALIFAX HEALTH

303 N. Clyde Morris Blvd
Daytona Beach, FL 32114
386.425.4278

halifaxhealth.org

Ethics and Concerns Hotline: 1.844.251.1880
Ethics and Concerns Website: halifaxhealth.ethicspoint.com

Compliance Committee Page on *PULSE*:
https://pulse.halifaxhealth.org/portal.aspx?bo=b6portal.wo&start=Dir*c=1031542