

AM-06
CODE OF ETHICS
Page 1 of 17

POLICY:

In recognition of the Kettering Health Network (“KHN”) responsibility to our patients and their families, employees, visitors, physicians, volunteers, students and the community we serve, the Board of Directors has established this statement of organizational ethics. It is the responsibility of every member of KHN – board of directors, administration, medical staff members, employees – to act in a manner that is consistent with this statement and its supporting policies. Each medical staff member and/or medical staff privileged individual shall abide by the ethical principles of his or her profession as well as the guidelines of the KHN code of ethics, as a condition of membership and/or privileging.

DEPARTMENTS AFFECTED:

All medical center departments. **Sponsoring Department: Administration**

GUIDELINES:

KHN’s Code of Ethics reflects KHN’s Basic Values:

- to provide high-quality, cost-effective health services in the most appropriate setting;
- to fairly and accurately represent itself and its capabilities;
- to provide services to meet the identifiable needs of patients and constantly seek to avoid the provision of those services, which are unnecessary or nonefficacious.
- adhere to appropriate standards of care throughout the organization;
- to be honest, trustworthy and reliable in all relationships;
- to foster solid relationships based on Christian ideals through the development of partnership arrangements with providers of health services;
- to be innovative, compassionate and caring;
- to pursue fiscal responsibility and growth;

© 1998 Council of Ethical Organizations. These materials are proprietary and protected by copyright registration to the Council of Ethical Organizations. Reproduction or dissemination—by any means—including photocopying and transmittal by FAX—is a violation of federal copyright law (17 USC 101 *et seq*) punishable by fines of up to \$100,000 per violation. Violators will be prosecuted. Do not copy, quote or disseminate without specific written permission.

Administrative Policy

AM-06
CODE OF ETHICS
Page 2 of 17

- to treat employees fairly and equitably.

In all of the various settings in which this organization provides patient services, we will follow well-designed standards of care based upon the needs of the patient and without regard to their ability to pay or without considering the hospital's reimbursement mechanism. Even as every effort is made to provide care in a more economical manner to patients and providers, the Medical Center shall strive to provide care that meets high quality standards.

We will also protect the integrity of clinical decision making, regardless of how the hospital compensates or shares financial risk with its leaders, managers, clinical staff, and licensed independent contractors. Even as every effort is made to provide care in a more economical manner to patients and providers, the Medical Center shall strive to provide care that meets high quality standards based on identified patient specific health care needs.

We will provide services to those patients who can be cared for safely. Those whose care is beyond our capabilities will be transferred to an appropriate facility at the earliest possible opportunity.

KHN shall strive to provide quality care that is appropriate in the circumstance in which such care is provided, regardless of the location within the facility in which that care is provided.

A. THE CODE OF ETHICS AND CORPORATE INTEGRITY

This Code of Ethics must be observed by all KHN employees. No KHN employee, regardless of his or her position, may allow personal preferences, convenience or business pressures to compromise this Code of Ethics. It is the responsibility of each employee to report, to the proper individuals within the organization, any ethical concerns or questions concerning KHN's business activities, and to report any potential violation of law or regulation by anyone representing the hospital system.

This statement of KHN's Code of Ethics provides general information about KHN's business principles and integrity guidelines. It does not replace KHN's existing policies, procedures or practices. More importantly, it cannot take the place of honest and open discussion between employees at all levels of the organization.

© 1998 Council of Ethical Organizations. These materials are proprietary and protected by copyright registration to the Council of Ethical Organizations. Reproduction or dissemination—by any means—including photocopying and transmittal by FAX—is a violation of federal copyright law (17 USC 101 *et seq*) punishable by fines of up to \$100,000 per violation. Violators will be prosecuted. Do not copy, quote or disseminate without specific written permission.

Administrative Policy

AM-06
CODE OF ETHICS
Page 3 of 17

Any violation of the Code of Ethics by a KHN employee will be treated as a serious matter that may lead to disciplinary action up to and including termination.

Should you ever have a question about this Code of Ethics or an integrity concern, you should discuss it with your supervisor. He or she is often closest to the situation and best able to help you find the answer you need. However, KHN recognizes that you may be uncomfortable raising certain questions with your supervisor or manager. You are welcome to call the KHN Integrity Office at 937-395-3960.

The KHN Integrity Office is available for all employees to report concerns or to obtain answers to your ethics or integrity related questions. If someone in the Integrity Office cannot answer your question directly, they will help to identify the correct source for additional information, advise you of procedures to follow, and assist you as appropriate. You may call the Office anonymously. Inquiries are handled confidentially, up to the limits imposed by law. No employee who contacts the Integrity Office will suffer retaliation or harassment as a result of such a call. KHN will take firm and decisive action to discipline any employee, supervisor or manager who takes inappropriate action against any employee for contacting the Integrity Office.

KHN supervisors and managers have a special obligation to be open to employee concerns about ethics. Even if an employee raises an uncomfortable question or is critical, every manager should welcome the employee's questions or concerns, and, as appropriate, seek assistance in addressing them. If a supervisor does not know how to answer a question or address a concern, the KHN Integrity Office is available to assist him or her in responding to the employee.

All KHN employees have an obligation to report incidents or activities which they believe may be in violation of the Code of Ethics, or otherwise unethical. It is KHN's policy to protect employees who in good faith report incidents involving violations or possible unethical behavior. If any employee knows of any retribution or retaliation that occurs against someone who has made a report of a possible violation, the employee should promptly report it to the KHN Integrity Office.

© 1998 Council of Ethical Organizations. These materials are proprietary and protected by copyright registration to the Council of Ethical Organizations. Reproduction or dissemination—by any means—including photocopying and transmittal by FAX—is a violation of federal copyright law (17 USC 101 *et seq*) punishable by fines of up to \$100,000 per violation. Violators will be prosecuted. Do not copy, quote or disseminate without specific written permission.

Administrative Policy

B. QUALITY

Kettering Health Network shall deliver high-quality health services to patients in a responsible, reliable and cost-effective manner, and in accordance with our Christian Medical mission.

General Standards of Quality

- You shall perform your job responsibilities with integrity and honesty for the advantage of your patients, and will always give your best efforts to the patient, families, the KHN community and your fellow employees.
- Because your patients depend on you for their health and safety, it is the responsibility of every employee to note any problems, deficiencies or errors, even those that seem small or insignificant. You shall promptly report such matters to your supervisor or manager or to a KHN authority.
- Every employee is responsible for providing health services and products, which comply with all applicable laws, regulations and standards, including state and federal legislation regarding patients' rights.

C. STANDARDS OF QUALITY CARE

- Every employee is expected to uphold sound standards of professional practice in all KHN facilities and programs. Only properly qualified individuals may practice in KHN facilities and programs.
- You should assess the requirements and needs of each patient and fulfill your professional responsibilities by providing appropriate services. When it is practical, you should seek input from families, medical staff, and referral and payor sources.
- Clinical assessments of prospective patients should be undertaken by individuals qualified to conduct such assessments. If a qualified individual is not available, the prospective patient should not be admitted except as required to prevent harm to the patient.

© 1998 Council of Ethical Organizations. These materials are proprietary and protected by copyright registration to the Council of Ethical Organizations. Reproduction or dissemination—by any means—including photocopying and transmittal by FAX—is a violation of federal copyright law (17 USC 101 *et seq*) punishable by fines of up to \$100,000 per violation. Violators will be prosecuted. Do not copy, quote or disseminate without specific written permission.

AM-06
CODE OF ETHICS
Page 5 of 17

- Every employee is required to maintain complete and accurate medical records and documentation to meet the requirements of medical staff bylaws, facility policies, accreditation standards, and all laws and regulations.

D. A RESPECT FOR THE PATIENT

Every employee should treat all patients with dignity, respect, and courtesy. Patients (or their appropriate surrogates) will be involved in decisions regarding the care that we deliver to the extent that such involvement is practical and possible. You should recognize the need that all patients have to be adequately informed about proposed care and treatment including appropriate assessment and management of pain and end of life decisions, so that patients can best exercise their right of self-determination in medical care matters. You should strive to inform all patients about the availability of an ethics consultant and/or ethics committee. You should constantly seek to understand and respect their point of view.

Patients and when appropriate, their families, have a right to be informed about outcomes of care, including unanticipated outcomes. The responsible licensed independent practitioner or designee shall clearly explain to the patient and when appropriate, the family, the outcome of any treatments or procedures, which differ significantly from the anticipated outcome.

In all circumstances, you should attempt to treat patients in a manner giving reasonable thought and consideration to background, age, culture, religion, and heritage.

E. PATIENT RESEARCH, INVESTIGATION OR CLINICAL TRIALS

Any patient research, investigation or clinical trials in which patient treatment will be influenced will be referred to the Medical Center Institutional Review Board for review prior to allowing the project to proceed.

F. PATIENT CONFIDENTIALITY

The organization recognizes the vital need to maintain patient and other information in a confidential manner. Patient information will not be shared unless authorized. Sensitive information concerning personnel and management issues will be maintained in the strictest confidence and utilized only by those individuals authorized to review and act upon such information.

© 1998 Council of Ethical Organizations. These materials are proprietary and protected by copyright registration to the Council of Ethical Organizations. Reproduction or dissemination—by any means—including photocopying and transmittal by FAX—is a violation of federal copyright law (17 USC 101 *et seq*) punishable by fines of up to \$100,000 per violation. Violators will be prosecuted. Do not copy, quote or disseminate without specific written permission.

Administrative Policy

G. RESEARCH

Anyone involved in research within the KHN must avoid any and all conflicts of interest. These include: situations or actions in which financial or personal consideration may compromise, or have the appearance of compromising, an investigator's professional judgment in conducting or reporting research. This policy applies to staff members who apply for, or who are currently working on pharmaceutical research studies, grants, contracts, internally support, or cooperative research projects, which are funded in whole or in part by non-federal external sources as well as federal funds. For more detailed policy information, contact the IRB Office.

H. ADVERTISING AND MARKETING PRACTICES

The Medical Center is committed to telling the truth so that the public is not misled. When we advertise we will make claims for which there is appropriate evidence and we will refrain from making false, misleading or unsubstantiated statements or claims about a competitor or his products or services. Advertising containing testimonials shall be limited to those of competent witnesses who are reflecting a real and honest opinion or experience.

I. LEGAL RESPONSIBILITIES INCLUDING PROPER DOCUMENTATION, BILLING AND CODING PROCEDURES

Every KHN employee, contractor and vendor must uphold all laws and regulations. If there is any doubt as to the legality of any action, you should seek advice from your supervisor or manager and, as appropriate, designated KHN legal counsel before taking that action. In addition, you may contact the KHN Integrity Office at any time for assistance or to seek guidance. KHN shall only pursue business opportunities and relationships that are legal and consistent with KHN's Code of Ethics. No employee, no matter what his or her position or authority within the KHN community, may instruct any other employee to undertake an illegal activity on behalf of the hospital.

- It is the responsibility of each employee to prepare and maintain patient and company records and reports accurately, and retain and preserve such records as provided by KHN policies and procedures.

AM-06
CODE OF ETHICS
Page 7 of 17

- Only services actually rendered and fully documented in patients' medical records may be billed. You will only use billing codes that accurately describe the services actually provided.
- You must strive to verify that all required documentation is included in the record before any claim for payment may be submitted. Any claim for payment or reimbursement that is false, fraudulent or otherwise inaccurate is strictly prohibited.
- KHN shall accurately specify the services to be provided, benefits to be received, realistic time commitments, and reasonable compensation rate(s) in all contracts with clinicians and referral sources.
- All contracts must be reviewed before they are signed by an authorized representative of KHN. Various factors determine the required level of review. Many contracts require review by legal counsel as well as senior management.

J. CONFLICTS OF INTERESTS

Every KHN employee must avoid both conflicts of interests and the *appearance* of conflicts of interests between your responsibilities as KHN employees and any outside interest. Appearances count when it comes to conflicts of interests since others around you may judge the fairness and appropriateness of your conduct merely by how it appears.

A conflict of interests exists when the loyalty of a KHN employee is divided between his or her responsibilities to KHN and to an outside interest. A good rule of thumb is that a potential conflict of interests exists any time someone viewing your actions might wonder if these actions are motivated solely by your responsibilities to KHN.

The basic standard for dealing with conflicts of interests is simple:

- If you believe a conflict of interests exists, you must disclose it to KHN management. Until you have disclosed and resolved the potential conflict with your supervisor, manager or the KHN Integrity Department, treat the situation as if a conflict definitely exists.

No set of principles can cover every type of conflict of interests. The following are merely examples of some important types of conflicts of interests:

© 1998 Council of Ethical Organizations. These materials are proprietary and protected by copyright registration to the Council of Ethical Organizations. Reproduction or dissemination—by any means—including photocopying and transmittal by FAX—is a violation of federal copyright law (17 USC 101 *et seq*) punishable by fines of up to \$100,000 per violation. Violators will be prosecuted. Do not copy, quote or disseminate without specific written permission.

Administrative Policy

AM-06
CODE OF ETHICS
Page 8 of 17

- As a KHN employee, you should avoid conducting business with any firm or company in which you, members of your family, or your close business and personal associates have a direct or indirect interest (that is, ownership in the business, or make money from its business).
- If you are involved in a personal business venture, it must be conducted outside the KHN work environment, and you may not conduct such business during company work time.
- It is important to avoid direct responsibility for the hiring or supervision of a family member or business associate.
- Every employee should avoid soliciting, offering, accepting or providing any payment from or to anyone else, such as meals, gifts, transportation or entertainment, that might be considered to conflict with KHN's business interests,
- No KHN employee may accept gifts in violation of the Gifts and Gratuities policy. Gifts must be documented and reported to your supervisor or manager who will decide how such gifts should be handled. Gifts, entertainment, and meals associated with legitimate business activities and of modest value are not prohibited, but must comply with the applicable KHN policy and procedure. Acceptance of cash gifts, including tips, of any amount is prohibited.
- You must guard patient and provider information against improper access or use by unauthorized individuals, such as someone seeking financial gain from unauthorized access to this information.
- KHN must avoid any appearance of impropriety when dealing with clinicians and referral sources. Cash gifts to clinicians or referral sources are prohibited. Non-cash gifts to clinicians or referral sources that exceed normal business courtesy and/or have a value exceeding the Gifts and Gratuities policy are prohibited. If circumstances seem to dictate a gift exceeding this limit, prior approval must be obtained from the Chief Executive Officer and the reason for the gift documented. Refer to the applicable KHN operations policy and procedure for the approval process.

© 1998 Council of Ethical Organizations. These materials are proprietary and protected by copyright registration to the Council of Ethical Organizations. Reproduction or dissemination—by any means—including photocopying and transmittal by FAX—is a violation of federal copyright law (17 USC 101 *et seq*) punishable by fines of up to \$100,000 per violation. Violators will be prosecuted. Do not copy, quote or disseminate without specific written permission.

Administrative Policy

AM-06
CODE OF ETHICS
Page 9 of 17

- KHN shall maintain impartial relationships with actual and potential vendors and contractors. You must avoid exerting or appearing to exert influences on behalf of those with whom KHN does business or may do business because of friendship or any other relationship.
- All vendors and contractors who have or desire business relationships with KHN are encouraged to abide by the Code of Ethics. KHN employees having knowledge of vendors or contractors who violate this Code in their relationships with KHN should report these to their supervisor or other KHN authority immediately.
- No employee may endorse or appear to endorse any product or service on behalf of KHN without explicit prior approval to do so.
- If any employee serves as a member of an outside organization or board or in public office, the employee shall abstain from any decision or discussion affecting KHN and make it clear why he or she is abstaining, except when specific approval has been given by the KHN legal counsel to participate in such discussion or decision.
- The tax-exempt requirements further prohibit an employee in his or her official capacity, on behalf of KHN, from participating or intervening in any political campaign. This political campaign activity prohibition precludes an employee from engaging in the following activities on behalf of KHN:
 - Publishing or distributing written statement on corporate letterheads, emails or other official documents, making oral statements on behalf of or in opposition to any candidate for any federal, state, or local office.
 - Distributing partisan campaign literature through official channels.
 - Providing financial or in-kind support (use of volunteers, paid staff, equipment, mailing lists, etc.) to a candidate for any federal, state, or local office.

If you have any questions regarding whether you, as an employee or representative of KHN may contribute to a political candidate or election, or participate or intervene in any political campaign you are required to seek assistance from the Corporate Integrity Office to determine if such conduct is appropriate.

© 1998 Council of Ethical Organizations. These materials are proprietary and protected by copyright registration to the Council of Ethical Organizations. Reproduction or dissemination—by any means—including photocopying and transmittal by FAX—is a violation of federal copyright law (17 USC 101 *et seq*) punishable by fines of up to \$100,000 per violation. Violators will be prosecuted. Do not copy, quote or disseminate without specific written permission.

Administrative Policy

Always disclose and seek resolution of any actual or potential conflict of interests – whether or not you consider it an actual conflict — before taking a potentially improper action. Board members, administration, management, and medical staff leaders shall be required to submit an annual Conflict of Interest Statement to disclose potential conflicts related to decisions that arise during the course of a year. The Governing Board as well as senior management and the medical staff shall review all potential conflicts and take appropriate action. In the event that a potential conflict of interest has a direct implication for patient care, the institution may convene the Ethics Committee to assist with the resolution of this issue.

K. RESPONSIBLE USE OF HOSPITAL ASSETS

Every employee has the responsibility to protect KHN’s assets and assets entrusted to us by others, against loss, theft and misuse. You must be equally diligent in protecting the assets of others, such as our patients, professionals and employees who work on our premises.

Responsible Use of KHN’s Assets

- It is important to preserve KHN’s property, facilities, equipment and supplies. This includes all KHN property, whether owned or leased. KHN property includes office and medical equipment, vehicles, supplies, reports and records, computer software and data, trademarks and service marks, intellectual property, facilities and company-provided services. No employee may take, use or copy KHN property or material for the employee’s own use or for the use of any unauthorized person or organization.
- Employees may only dispose of surplus, obsolete or junked property according to company policies. Incorrect disposal of property must be avoided.

Responsible Use of the Assets of Others

- Each employee shall protect patient property and information and handle all such property and information according to KHN policies. Patient information may be shared only with those who have a legitimate need to review it and are authorized to receive such information.

© 1998 Council of Ethical Organizations. These materials are proprietary and protected by copyright registration to the Council of Ethical Organizations. Reproduction or dissemination—by any means—including photocopying and transmittal by FAX—is a violation of federal copyright law (17 USC 101 *et seq*) punishable by fines of up to \$100,000 per violation. Violators will be prosecuted. Do not copy, quote or disseminate without specific written permission.

AM-06
CODE OF ETHICS
Page 11 of 17

- It is important for every employee to protect proprietary (that is, confidential) information provided to us by actual and potential vendors, referral sources, contractors, service providers and others.
- Employees shall protect intellectual property developed as part of your employment by KHN. You may not share this with another employer while working for KHN or after departing KHN, and must return any such material in your possession to KHN upon termination of employment.

L. MAINTAINING A SAFE TREATMENT AND WORK ENVIRONMENT

- KHN shall maintain a safe and healthy treatment and work environment. Because of KHN's commitment to its patients, it is important for each employee to make this an environment that fosters privacy, security and comfort of patients.
- KHN upholds all policies, procedures, laws, regulations, standards and practices intended to make the treatment and work environment healthy and safe.
- KHN upholds all policies, procedures, laws, regulations, standards and reporting requirements relating to the environmental aspects of KHN's operations. This includes use of buildings and property, and the proper use and handling of laboratory processes, chemicals, medical equipment, bio-hazardous waste and by-products.
- Each employee shall ensure that drugs and pharmaceuticals are safely stored, inventoried, and that missing supplies are promptly reported to the appropriate supervisor or manager.
- It is the responsibility of each KHN employee to correctly dispose of medical waste, environmentally sensitive materials, and any hazardous material. If you are ever uncertain of the correct procedure for disposing of any material, you should immediately consult your supervisor or manager for assistance.
- KHN supervisors shall understand and apply all KHN policies and procedures for disposal of materials applicable to their areas of responsibility, and shall implement practices to assist employees in correctly disposing of materials.

© 1998 Council of Ethical Organizations. These materials are proprietary and protected by copyright registration to the Council of Ethical Organizations. Reproduction or dissemination—by any means—including photocopying and transmittal by FAX—is a violation of federal copyright law (17 USC 101 *et seq*) punishable by fines of up to \$100,000 per violation. Violators will be prosecuted. Do not copy, quote or disseminate without specific written permission.

Administrative Policy

AM-06
CODE OF ETHICS
Page 12 of 17

- If any employee should observe any practice or condition that may not meet KHN policies and procedures or any laws, standards or regulations, the employee is required to promptly report this to his or her supervisor, manager or an appropriate KHN authority. The KHN Integrity Office is always available to assist any employee who believes that a violation has occurred.

M. PROTECTIVE SERVICES

KHN supports the right of patients to access protective services. These include guardianship and advocacy services, conservatorship, and child or adult protective services. KHN will have ways to help patients' families and the courts determine a patient's need for special services, such as guardianship. If such services become especially pertinent to the population served by KHN, we will see to it that the patient is given, in writing:

- A list of names, addresses, and telephone numbers of pertinent state client advocacy groups such as the state survey and certification agency, the state licensure office, the state ombudsman program, the protection and advocacy network, and the Medicaid fraud control unit; and,
- Information regarding the patient's right to file a complaint with the state survey and certification agency if he or she has a concern about patient abuse, neglect or about misappropriation of a patient's property in the facility.

N. FAIR AND EQUITABLE TREATMENT OF EMPLOYEES

- KHN encourages all employees to develop their skills and potential and treat one another in a fair and respectful manner.
- KHN prohibits discrimination on the basis of race, color, religion, sex, national origin, age, disability, veteran status, or any other characteristic protected by law. All employment related decisions will reflect this firm commitment.
- KHN shall strive to create a workplace and treatment environment free of sexual or other harassment. Harassment is strictly prohibited in all KHN facilities and programs, and will not be tolerated. KHN's policy on harassment, contained in the Employee Guide, details the type of behavior that constitutes prohibited harassment. Any such behavior will result

© 1998 Council of Ethical Organizations. These materials are proprietary and protected by copyright registration to the Council of Ethical Organizations. Reproduction or dissemination—by any means—including photocopying and transmittal by FAX—is a violation of federal copyright law (17 USC 101 *et seq*) punishable by fines of up to \$100,000 per violation. Violators will be prosecuted. Do not copy, quote or disseminate without specific written permission.

Administrative Policy

AM-06
CODE OF ETHICS
Page 13 of 17

in immediate disciplinary action up to and including termination of employment. Should any employee observe or experience any such harassment, he or she is expected to promptly report such behavior to his or her supervisor or manager or another appropriate KHN authority.

- Each employee should take advantage of opportunities to develop your skills, talents, knowledge and understanding of your jobs. KHN's commitment to providing high-quality services to our patients requires that each employee strive to improve his or her ability to perform their job.
- Each employee shall strive through words and actions to create a professional atmosphere in the work environment that will be admired by employees, patients and visitors.
- Every employee shall observe the standards of the employees' professions and exercise judgment and objectivity. Significant differences of opinion in professional judgment should be promptly referred to your supervisor, manager or other KHN authority within or beyond the facility for resolution.
- KHN supervisors and managers shall encourage employee input through regular meetings, through personal communication with your employees, and through other methods of communication. Every KHN supervisor and manager has a responsibility to create a work environment in which ethical or integrity concerns can be raised and openly discussed without fear of retribution or retaliation.
- Each KHN employee shall show respect and consideration for every other employee, regardless of position, station or relationship.
- KHN recognizes the diversity of our employees, staffs, patients and communities as a valuable asset. KHN views diversity as essential to realizing our commitments to quality, community and service.
- At KHN, every employee recognizes the unique working relationship between physicians and KHN employees. The privileges granted to physicians are governed by procedures outlined by the medical staff by-laws. KHN promotes its ethical conduct and standards among all physicians who practice in KHN hospitals, and encourages their participation and support of the ethics program.

© 1998 Council of Ethical Organizations. These materials are proprietary and protected by copyright registration to the Council of Ethical Organizations. Reproduction or dissemination—by any means—including photocopying and transmittal by FAX—is a violation of federal copyright law (17 USC 101 *et seq*) punishable by fines of up to \$100,000 per violation. Violators will be prosecuted. Do not copy, quote or disseminate without specific written permission.

Administrative Policy

- In those facilities of KHN, which require longer lengths of stay, patients have the right to either perform or refuse to perform tasks in and for the hospital. In no case will such work endanger the patient, other patients or the staff.

O. FOR YOUR INFORMATION

In addition to this Code of Ethics, KHN, from time-to-time, issues statements of policy directed at legal or business matters relevant to particular parts of its business, and general policies on managing and motivating its work force. Copies of these policies and procedures can be reviewed by contacting your supervisor or Human Resources Office. All employees are expected to comply with all statements of policy, procedure and practice of KHN, as well as with lawful and ethical business practices, whether or not they are specifically mentioned in the Code of Ethics.

The KHN “Employee Guide” is an example of a document that is useful in providing more detailed information to employees. This manual is particularly applicable to issues related to human resources, including the Employee Appeal Process policy and procedure. This policy prescribes a systematic method within the organization for employees to use in resolving problems.

Other documents on policy may be published at various KHN organizational levels. Such documents are revised periodically and others may be published. Employees are expected to be familiar with and comply with them.

P. RELATED INFORMATION

The following related documents, policies and procedures shall provide further and specific guidance for ethical conduct at the Medical Center:

- Mission Statement
- Vision Statement
- Philosophy
- Employee Handbook
- Medical Staff Bylaws

© 1998 Council of Ethical Organizations. These materials are proprietary and protected by copyright registration to the Council of Ethical Organizations. Reproduction or dissemination—by any means—including photocopying and transmittal by FAX—is a violation of federal copyright law (17 USC 101 *et seq*) punishable by fines of up to \$100,000 per violation. Violators will be prosecuted. Do not copy, quote or disseminate without specific written permission.

AM-06
CODE OF ETHICS
Page 15 of 17

Administrative Policy Manual:

MS-01	Accepted Standards of Medical Practice
AM-05	Tips and Gifts
HU-02	Conflict of Interest
IS-01	Software Copyright Infringement
PC-01	Involuntary Hospitalization of the Mentally Ill
ER-03	Rerouting from KMH and SH Emergency Departments
PC-03	Organ, Tissue, Eyes, and Whole Body Procurement
PC-14	HIV: Testing and Reporting Results Following Exposure to Infectious Disease
MS-09	Withholding/Withdrawal of Life Sustaining Treatment
PR-08	Patient Advance Directives
ER-02	Emergency Medical Care When Consent Is Not Available
SS-03	Juvenile Court Authorization of Medical Treatment for Minors
S-01	Duty to Report Felonies and Other Circumstances to Law Enforcement Authorities
PC-05	Teletype Devices for the Deaf
ER-06	Emancipated Minors
SS-02	Transfer of Patients to Other Facilities
ER-05	Sexual Assault Exam
ER-07	Sexual Assault
SS-01	Child Abuse
PR-03	Interpreter Services for the Deaf and Hearing Impaired
MR-01-03	Medical Records Information, Release Of, Use Of By Students, Use On The Unit
MS-06	Consent to Procedures
SS-05	Court Order For The Treatment of Incompetent Adults
PR-04	Patient Rights
PC-11	Restraints
AM-07	Conflict Resolution
AM-09	Cooperating with Governmental Investigations
AM-10	Non-Retaliation/Non-Retribution for Reporting

Human Resources Policy Manual:

HR-17	Employee Appeal Procedure
-------	---------------------------

© 1998 Council of Ethical Organizations. These materials are proprietary and protected by copyright registration to the Council of Ethical Organizations. Reproduction or dissemination—by any means—including photocopying and transmittal by FAX—is a violation of federal copyright law (17 USC 101 *et seq*) punishable by fines of up to \$100,000 per violation. Violators will be prosecuted. Do not copy, quote or disseminate without specific written permission.

Administrative Policy

HIPAA relate policies found on the HIPAA intranet

Corporate Integrity policies found on the intranet

Q. KHN INTEGRITY PROGRAM INFORMATION

Information about KHN's Integrity Program, reports of possible ethical misconduct, or related questions can be directed to the KHN Integrity Office by:

TELEPHONE: 937-395-3960

MAIL: Corporate Integrity Department
Attention: Robert L. Patterson, JD
Corporate Integrity Officer
3490 Far Hills Avenue, #201
Kettering, Ohio 45429

The Integrity Office is staffed between 8:00 a.m. and 4:30 p.m., Eastern Standard Time, Monday through Friday.

R. SUGGESTIONS FOR CHANGE TO THIS DOCUMENT

KHN's Code of Ethics is a living document, which will be updated periodically. If you have suggestions for improvement that are not addressed, please call the KHN Integrity Office at 937-395-3960, or write to the Corporate Integrity Department at the address above.

© 1998 Council of Ethical Organizations. These materials are proprietary and protected by copyright registration to the Council of Ethical Organizations. Reproduction or dissemination—by any means—including photocopying and transmittal by FAX—is a violation of federal copyright law (17 USC 101 *et seq*) punishable by fines of up to \$100,000 per violation. Violators will be prosecuted. Do not copy, quote or disseminate without specific written permission.

Administrative Policy

AM-06
CODE OF ETHICS
Page 17 of 17

DEVELOPED BY:	James Londis, PhD., former Director of Ethics and Corporate Integrity and Medical Staff Executive Committee Administration
SPONSORING DEPT:	
DATE OF ORIGIN:	03/18/97
LAST REVIEWED:	04/30/07
DATE APPROVED:	06/14/07
APPROVED BY:	KMC Executive Council
DATE EFFECTIVE:	06/14/07

© 1998 Council of Ethical Organizations. These materials are proprietary and protected by copyright registration to the Council of Ethical Organizations. Reproduction or dissemination—by any means—including photocopying and transmittal by FAX—is a violation of federal copyright law (17 USC 101 *et seq*) punishable by fines of up to \$100,000 per violation. Violators will be prosecuted. Do not copy, quote or disseminate without specific written permission.

Administrative Policy