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 Owner: David Lane: Chief Compliance Officer
 Policy Area: Compliance
 Departments:
 Applicability: Providence St. Joseph Health Systemwide + PGC

PSJH-RIS-722 Code of Conduct Policy

Executive Sponsor:	Sheryl Vacca, SVP, Chief Risk Officer
Policy Owner:	David Lane, VP, Chief Compliance Officer
Contact Person:	Karen Coleman, Director, Compliance Services

Scope:
 This policy applies to Providence St. Joseph Health and its Affiliates¹ (collectively known as "PSJH") and their caregivers (employees); employees of our affiliated organizations, professional staff, volunteers and others who are in the direct control of the organization; and members of the PSJH System Board; Community Boards; and Foundation Boards, trustees (collectively referred to as workforce members). This is a governance level policy approved by the Board of Directors and signed by the President/CEO.

Purpose:
 To define personal and professional standards of conduct and acceptable behaviors for all workforce members, while carrying out assigned responsibilities within PSJH. This policy, along with the Code of Conduct, shall guide workforce members in business interactions with interested parties (e.g., suppliers, vendors, physicians, donors, politicians, etc.).

Definitions:
Risk and Integrity Services Compliance Program is fully described in the Risk and Integrity Compliance Program Description approved by the Board of Directors.
Workforce Member is defined as all caregivers, employees of affiliated organizations, board of directors, community board members, foundation board members, volunteers, students, independent contractors, and other persons under direct control of a PSJH entity, whether paid by PSJH.

Policy:
 PSJH maintains a Code of Conduct (The Code) approved by the PSJH Board of Directors for its workforce members across the PSJH organization. This document describes and encourages behaviors in support of our mission, vision, and values to prevent and halt unethical or unlawful behavior as soon as reasonably possible after discovery. The Code provides PSJH employees an understanding of expectations and their responsibilities as a PSJH employees including their responsibility to report concerns.

Requirements:

1. The Code will be provided either in paper format or electronically to caregivers prior to hire but in

no event later than 90 days of hire. Thereafter, a link will be provided to the Code whenever an update occurs, and will also be included within the annual compliance education.

2. It is the responsibility of workforce members to:
 - a. Act in a manner consistent with the Code, its supporting policies and procedures as well as applicable federal, state and local laws, and regulations;
 - b. Support the Code by holding others accountable to the standards of conduct established in the Code;
 - c. Seek clarification of any part of the Code that is not understood or where a question arises; and
 - d. Report concerns or alleged violations promptly as outlined in the Code
3. The Code is available to workforce members in printed and/or electronic form in languages determined by management to meet the needs of PSJH's diverse workforce.
4. The Code is reviewed and updated periodically.
5. Generally, the Code will cover the following topics:
 - a. Mission and values;
 - b. Purpose of the Code;
 - c. Information on the Compliance Program;
 - d. How to report a concern;
 - e. Non-retaliation and corrective action;
 - f. Standards that address, for example, Patient Standards, Conflicts of Interest, Legal and Regulatory Compliance, and Business Conduct and Practices.
6. Other ministry specifics operationalizing the PSJH Code of Conduct may be implemented as long as they do not conflict with the PSJH Code of Conduct.

References:

[PSJH Code of Conduct](#)

Attachments:

No attachments.

Applicability:

¹ For purposes of this policy, "Affiliates" is defined as any entity that is wholly owned or controlled by Providence St. Joseph Health (PSJH), Providence Health & Services, St. Joseph Health System, Western HealthConnect, Covenant Health Network, Inc., or is jointly owned or controlled by PSJH or its Affiliates and bears the Providence, Swedish Health Services, Swedish Edmonds, St. Joseph Health, Covenant Health Network, Covenant Health, Kadlec Regional Medical Center, or PacMed Clinics name (includes Medical Groups, Hospice, Home Health, etc.).

Attachments

No Attachments

Approval Signatures

Approver	Date
Cynthia Johnston: Compliance Spec PSJH	03/2020
Cynthia Johnston: Compliance Spec PSJH	03/2020
Cynthia Johnston: Compliance Spec PSJH	03/2020

Applicability

AK - Providence Alaska MC, AK - Providence Kodiak Island MC, AK - Providence PEC/PTCC, AK - Providence Seward MC, AK - Providence St. Elias Specialty Hospital, AK - Providence Valdez MC, CA - Healdsburg Hospital, CA - Mission Hospitals, CA - PSJH Physician Enterprise Northern, CA - PSJH Physician Enterprise Southern, CA - Petaluma Valley Hospital, CA - Providence Cedars-Sinai Tarzana MC, CA - Providence Holy Cross MC, CA - Providence LCM MC San Pedro, CA - Providence LCM MC Torrance, CA - Providence Saint John's Health Center, CA - Providence Saint Joseph MC, Burbank, CA - Queen of the Valley Medical Center, CA - Redwood Memorial Hospital, CA - Santa Rosa Memorial Hospital, CA - SoCal Region, CA - St. Joseph Hospital - Eureka, CA - St. Joseph Hospital Orange, CA - St. Jude Medical Center, CA - St. Mary Medical Center Apple Valley, MT - Providence St. Joseph MC, Polson, MT - St. Patrick Hospital, NM - Covenant Hobbs Hospital, OR - Clinical Support Staff (CSS), OR - Connections, OR - Credena Health (CH), OR - Home Health (HH), OR - Home Medical Equipment (HME), OR - Home Services, OR - Home Services Pharmacy (HSRx), OR - Hospice (HO), OR - Providence Ctr for Medically Fragile Children, OR - Providence Health Oregon Labs, OR - Providence Hood River Memorial Hospital, OR - Providence Medford MC, OR - Providence Medical Group, OR - Providence Milwaukie Hospital, OR - Providence Newberg MC, OR - Providence Portland MC, OR - Providence Seaside Hospital, OR - Providence St. Vincent MC, OR - Providence Willamette Falls MC, PHCC - Home & Community Care, PHCC - Home Health, PHCC - Home Medical Equipment, PHCC - Hospice/Palliative Care, PHCC - Infusion/Pharmacy, PHCC - PACE (Programs of All-Inclusive Care), PHCC - Providence Home and Community Care (Legacy), PHCC - Skilled Nursing/Assisted Living, Providence Global Center, Providence St. Joseph Health, Providence and Kadlec Express Care, TX - Covenant Children's Hospital, TX - Covenant Hospital Levelland, TX - Covenant Hospital Plainview, TX - Covenant Medical Center, TX - Covenant Specialty Hospital, WA - EWA Providence Medical Group, WA - Kadlec Regional Medical Center, WA - NWR Providence Medical Group, WA - PacMed (coming soon), WA - Providence Centralia Hospital, WA - Providence DominiCare, WA - Providence Holy Family Hospital, WA - Providence Mt. Carmel Hospital, WA - Providence Physician Services, WA - Providence Regional MC Everett, WA - Providence St. Joseph's Hospital, WA - Providence St. Luke's Rehabilitation Medical, WA - Providence St. Mary MC, WA - Providence St. Peter Hospital, WA - Providence Surgery Center, Pacific Campus, WA - SWR Providence Medical Group, WA - Sacred Heart Med Ctr & Children's Hospital, WA - Swedish Medical Center, WA - Swedish Medical Group