

Privacy and
Confidentiality

Quality of
Care

Research

Coding/Billing
Integrity



Laws & Regs

Conflicts of
Interests

Code of Conduct

Our Values. Our Standards. The Way We Work.



Property Assets &
Information

Conduct
Employment

Customer Service

Dear DMC Employee,

We are pleased to provide you with a copy of our *Code of Conduct* booklet. The standards contained within the *Code of Conduct* reflect our commitment to conducting business and delivering health care in accordance with high ethical standards and compliance with laws and regulations. It is important you understand the *Code of Conduct* and the standards contained within it are only one component of the Detroit Medical Center's Compliance Program. Your personal involvement in the compliance process, along with reporting violations of the standards is also important.

Our employees have and will continue to develop the *Code of Conduct's* standards. These standards apply to the entire DMC community, which includes: employees, volunteers, physicians, and the Board of Trustees, as well any other individuals working on behalf of the Detroit Medical Center. Health care delivery takes us in many arenas during our day-to-day operations, and each of the standards speaks to our cooperative voice. The standards define the high expectations we have set for all associated with the DMC to meet and exceed. Finally, the Code is reaffirmation of our ongoing commitment to compliance and providing quality service to our patients, their families and the community we serve.

The continued success of our Compliance Program requires everyone's participation. You have our assurance we will uphold the standards set forth in the *Code of Conduct* and anticipate you, in turn, will do the same. The fine reputation of the Detroit Medical Center will continue to be strengthened as we work together.

Sincerely,



Michael E. Duggan
President and
Chief Executive Officer



Stanton M. Beatty, Esq
Vice-President, Compliance and
Associate General Counsel

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OUR CORPORATE COMPLIANCE PROGRAM

Introduction

The Detroit Medical Center (DMC) Corporate Compliance Program reflects in the clearest possible terms our commitment to exemplary health care and business operations. A key component of the compliance program is our *Code of Conduct*, which describes what is expected, and required, from our employees, physicians, students, volunteers and people with whom we do business.

The Board of Trustees of the DMC via its Audit & Corporate Compliance Committee oversees the compliance program and has appointed the DMC's Vice President of Compliance and Associate General Counsel to serve as the Chief Compliance Officer. To assist the vice president, a Corporate Compliance Committee has been created to provide additional oversight and guidance.

All of these individuals and groups are available to assist you in complying with the various laws, regulations, and DMC policies that govern our day-to-day operations and in meeting the standards included in our *Code of Conduct*.



Your Obligation to Report

Any situation that you believe violates our *Code of Conduct*, our policies and procedures, or the laws and regulations that affect us must be reported immediately. Failure to report a known violation may result in disciplinary action, even if you were not involved.

How to Report a Violation

Suspected violations should be reported to your supervisor. Our Compliance Program encourages the resolution of issues at a local level, when possible.

There may be times however when concerns cannot be addressed through the normal chain-of-command, or where for other reasons you do not wish to use these channels. In these cases, please call the [DMC Compliance Hotline toll free at 1-888-484-9200](tel:1-888-484-9200). You will remain anonymous, unless you choose to identify yourself. The DMC will make every effort to protect your identity to fullest extent of the law.

Non-Retaliation

No disciplinary action or other form of retaliation or revenge will be taken against any staff member who, in good faith, reports an issue, problem, concern, or violation to management, human resources, the Corporate Audit and Compliance Department, or to the DMC Compliance Hotline.

Reporting a violation does not protect individuals from appropriate disciplinary action for their own performance or conduct. However, self-disclosure may be viewed favorably and may serve to reduce potential disciplinary actions.

Reporting Violations

Suspected violations of our Code of Conduct, laws and regulations, or policies and procedures will be reviewed promptly. Some concerns may be reported to others to assist in their resolution. Your concerns will only be shared with others on a need to know basis, unless you indicate otherwise. All staff members are expected to cooperate fully with the review efforts.

Receipt of the Code of Conduct

All staff member will sign and date a statement that reflects their knowledge of and commitment to this *Code of Conduct*.

OUR CODE OF CONDUCT

The Board of Trustees has issued this *Code of Conduct* to provide guidance to ensure that our work is done in an ethical and legal manner. In addition, it emphasizes the shared common values that guide our actions and helps resolve questions about inappropriate conduct in the workplace.

The principles set forth in our *Code of Conduct* are mandatory and must be followed by all DMC employees, staff and affiliated persons (see definitions). Failure to comply with the code is a serious matter, which may lead to disciplinary action, up to and including immediate termination.

While we have attempted to be comprehensive, our *Code of Conduct* does not cover every possible situation or question that may arise. Our *Code of Conduct* provides a basic description of unacceptable conduct or performance that may lead to corrective action or termination of employment. Prohibited actions are not excused simply because they were taken with the knowledge of, or at the direction of a supervisor. Therefore, common or customary actions may violate the *Code of Conduct*.

Your adherence with our *Code of Conduct*, as well as all DMC corporate and department policies, regulations and rules of conduct is expected. If you have any questions, please talk to your supervisor. Management has been asked to be available and responsive to all staff questions and concerns.

Our *Code of Conduct* is a “living document.” As such, it will be amended and revised periodically to respond to changing conditions and to better reflect our commitments to:

Our Patients: We are committed to improving the health of the community we serve by providing the highest quality health care services in a caring and efficient manner.

Our Employees and Medical Staff: We are committed to creating a work environment in which employees and medical staff are treated respectfully, fairly and given opportunities for professional development.

Our Assets: We are committed to protecting our assets and the assets of others entrusted to us against loss, theft, destruction and misuse.

Our Payors: We are committed to maintaining timely and accurate patient records and to bill only for services actually rendered as documented in patient medical records.

Our Vendors: We are committed to avoiding conflicts, or the appearance of conflicts, between our private interests and our responsibilities as employees and staff.

Our Regulators: We are committed to complying with all laws and regulations and operating in an environment where the health, safety, privacy and comfort of patients and employees come first.

Our Community: We are committed to improving the health of the community we serve by providing quality health care services in a caring and efficient manner without discrimination.

OUR MISSION

The Detroit Medical Center is committed to improving the health of the population served by providing the highest quality health care services in a caring and efficient manner without invidious discrimination, regardless of the person's religion, race, gender, ethnic identification, or economic status. Together with Wayne State University, the DMC strives to be the region's premier health care resource through a broad range of clinical services, the discovery and application of new knowledge and the education of practitioners, teachers and scientists.

OUR VISION

In fulfilling its mission, the DMC aspires to natural preeminence as an integrated academic health system. We will continually improve our ability to meet, exceed, and anticipate the expectations of our customers and stakeholders. We will:

1. Be a leader in the delivery of high quality, cost effective care.
2. Provide a full continuum of accessible, responsive and personalized services through a multi-site, geographically dispersed delivery system.
3. In partnership with Wayne State University, be valued for our innovation and academic stature.
4. Have strong, mutually beneficial relationships with medical staff.
5. Be characterized by cohesive management leadership and a positive work environment.
6. Provide a high level of community service and stewardship for the resources with which we have been entrusted.
7. Be characterized by fiscal control, responsibility and efficiency.

OUR VALUES

In fulfilling our mission, we are driven both by our vision of national preeminence as a vertically integrated academic health system and by a set of values that will help us provide the best possible services to our patients and make us proud to be members of the DMC. These are:

Community Welfare: We are committed to improving the health of communities we serve and to being a socially responsive member of those communities.

Quality: We are committed to the pursuit of excellence and to the never-ending improvement of all processes and outcomes.

Respect and Involvement: We are committed to the creation of an environment characterized by ethical behavior, mutual trust, personal and professional development; fair, competitive compensation and recognition systems; and equal employment opportunity.

Teamwork: We are committed to collaboration and teamwork throughout the organization. Individuals and work groups are interdependent, and overall success can only be achieved through recognition of each other as “internal customers.”

Communication: We are committed to open and effective communication among all levels of the organization. Every individual will have an awareness of the DMC’s overall direction, as well as a clear understanding of their own role and relationship to the success of the organization.

Innovation and Education: We are committed to the discovery, transmission, and application of new knowledge, as well as openness to innovation, creativity and change.

Efficient and Effective Resource Use: We are committed to the effective and efficient use of the resources with which the community has entrusted us.



STANDARD 1

Quality of Care and Services

We are committed to improving the health of the community we serve by providing the highest quality health care services in a caring and efficient manner.

- A. We will respect the uniqueness of each person within our community and assure that each is treated with respect, dignity and courtesy at all times.
- B. We will not discriminate in the provision of care and services.
- C. We will consider a patient's culture, religion, and personal requests in determining and executing the plan of care. However, personal requests by patients and/or their family members will be superseded by our obligation to deliver quality care.
- D. We will require all clinicians to provide the care that is appropriate to each patient without regard to either the financial ability of the patient to pay or to the financial consideration that may result to the clinicians (because of) ordering or not ordering needed care.
- E. We will ensure that each patient receives quality care regardless of his/her ability to pay or source of payment.
- F. We will provide treatment to our patients in a safe manner, based on their clinical, psychological and other needs.
- G. We will seek to provide patients with products that perform as intended and which comply with all applicable laws, regulations and professional standards.

STANDARD 2

Privacy and Confidentiality

We are committed to fulfilling regulatory standards designed to handle all facets of information management, including reimbursement, coding, security, and patient records.

- A. We will protect against the unauthorized use and disclosure of protected health information, where prohibited.
- B. We will not disclose restricted/confidential information or documents.
- C. We will not permit any person to examine or make copies of any restricted/confidential information, unless authorized to do so.
- D. We will restrict access and use of each element of protected health information to only those persons who has a need to utilize the information in the fulfillment of their tasks.



STANDARD 3

Coding/Billing Integrity and Record Keeping

We are committed to maintaining timely and accurate patient records and billing only for services actually rendered as documents in patient medical records.

- A. We will take steps to ensure that all bills submitted for payment are accurate and comply with federal and state laws and regulations, and will audit our billing practices to ensure accuracy.
- B. We will ensure that the DMC bills for services using only billing codes that accurately describe the services that were provided.
- C. We will take immediate steps to alert the payor, correct the bill and refund credits when due, if inaccuracies are discovered in a bill that has already been submitted.
- D. We will maintain timely, accurate and complete medical records concerning each patient treated at a DMC facility.

STANDARD 4

Customer Service

We are committed to applying the Customer Service Standards, which are core to our values, to every interaction with every individual at all times focusing on servicing our patients and families.

- A. We will respect and protect the dignity of each person.
- B. We will treat customers with courtesy at all times.
- C. We take pride in our work environment and recognize customers as our responsibilities at all times.
- D. We will ensure a customer's right to privacy and modesty, and will maintain a secure and trusting environment.
- E. We will maintain professional behavior and dress to build customer confidence.
- F. We will provide service in a prompt, timely manner, putting the needs of customers first.



STANDARD 5

Compliance with Laws and Regulations

We require all staff members to conduct their individual duties and all DMC operations in a manner that meets all applicable legal, ethical and regulatory standards.

- A. We will not pursue any business opportunity that requires action in unethical or illegal activity.
- B. We will not participate in any corrupt business practice, including bribery, kickbacks or payoffs.
- C. We will maintain all business data, records, and reports completely, accurately and truthfully. All accounting books and records will be maintained according to generally accepted accounting practices and internal control procedures of the DMC.
- D. We will ensure all marketing and advertising by the DMC is truthful, fair, accurate and complete. We will not make any false or misleading statements about the DMC or its services or another organization or its services.
- E. We will ensure all contracts with clinicians and referral sources detail the specific services to be provided. Each proposed contract will be reviewed and approved in advance by Legal Affairs.
- F. We will ensure every contract payment or other benefit provided to clinicians and referral sources are for the services and at the rate required by a written contract.
- G. We will comply with all federal copyright laws as they pertain to licensing software products, as well as printed and audio-visual materials.
- H. We are committed to maintaining an Environment of Care in which all DMC facilities comply with the governmental and regulatory rules which promotes workplace health and safety. Employees are expected to disclose promptly any condition hazardous to human health or the environment. The DMC will take immediate action upon becoming aware of such conditions.

STANDARD 6

Work Place Conduct and Employment Practices

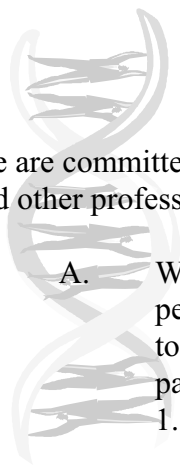
We are committed to creating a work environment in which employees, physicians and others are treated respectfully, fairly and afforded opportunities for professional development.

- A. We will not discriminate. We will hire, train, promote and pay on the basis of personal competence and potential for advancement without regard to race, color, religion, sex, sexual orientation, national origin, age, disability or other classifications protected by law or DMC policy.
- B. We will maintain zero tolerance for all conduct that is sexually harassing, abusive or offensive toward our staff, volunteers, and students.
- C. We will not tolerate workplace violence. As part of our commitment to provide a safe workplace, we will maintain a work environment free of misconduct that harasses, disrupts or interferes with an individual's work performance or creates an intimidating, offensive or hostile environment, which includes threats or acts of violence in the workplace. All persons within DMC facilities will:
 - 1. Refrain from any threats or acts of violence and immediately report any threats or acts of violence to appropriate personnel and/or security.
 - 2. Not possess firearms, other weapons, explosive devices, or other dangerous materials while on DMC property.
- D. We must remain free of the influence of illegal drugs or alcohol, and we will not tolerate the non-prescribed use of controlled substances. (Questions or concerns about effects of prescribed medications, and their effect on your job performance should be referred to your supervisor).
- E. Some staff members routinely have access to prescription drugs, controlled substances, and other medical supplies. We require that these items be maintained, dispensed, and transported in compliance with laws and regulations and then only by authorized individuals.
- F. We will not allow persons to report to work, or otherwise provide services at the DMC, unless they possess the mental acuity and sharpness necessary to perform their tasks in a safe and prudent manner.
- G. We will maintain the integrity and quality of our job performance by ensuring that staff members are familiar with the applicable laws, rules and regulations governing their area of work. The DMC will only employ those who possess the proper experience and competencies required to fulfill their tasks. In this regard the DMC will:
 - 1. Ensure that staff members who provide patient care are properly licensed and trained.
 - 2. Rely on employees to report deficiencies or errors to a supervisor for resolution.
 - 3. Identify areas for improvement and take steps to make positive changes.

STANDARD 7

Research

We are committed to following ethical standards in any research conducted by physicians and other professional staff.



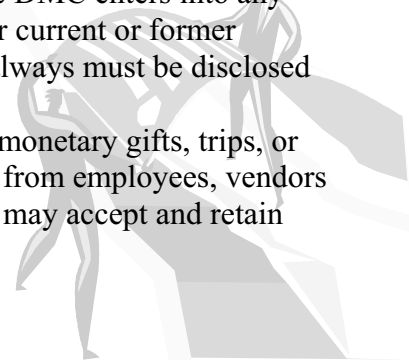
- A. We will notify patients whose personal physician proposes to engage in or perform research affecting their care or treatment that they have the right to refuse such participation and not compromise their health care. Also, patients will be:
 - 1. Given a description of the research/treatment and expected benefits.
 - 2. Advised of potential discomfort and risks of the research/treatment.
 - 3. Given a description of alternative beneficial services, if available.
- B. We will not inappropriately bill for experimental or unapproved drugs or devices.
- C. We will not misuse or abuse research information.
- D. We will apply for and administer grant funds in accordance with the terms of the grantor.

STANDARD 8

Conflicts of Interest

We are committed to regulating our activities to avoid conflicts of interest, actual impropriety and/or an appearance of impropriety.

- A. We have policies to guide employees in determining conflicts of interest and the appropriateness of activities or behaviors with vendors, providers, contractors, third party payors and government entities.
- B. We prohibit staff, physicians and others affiliated with the DMC from using their positions or knowledge obtained through their position to profit personally or to assist others in profiting at the expense of the DMC.
- C. We conduct all business transactions with vendors, contractors, and other third parties free from inducements intended to influence our decision-making.
- D. We make sure preferential treatment is avoided when the DMC enters into any financial arrangement with a current or former trustee, or current or former employee. That nature of such proposed arrangements always must be disclosed fully to the appropriate corporation officers.
- E. We do not solicit or accept anything of value, including monetary gifts, trips, or discounts, which would suggest or create any obligation from employees, vendors or others. Such gifts, if received are to be returned. We may accept and retain



from vendors non-monetary unsolicited gifts or nominal value, such as advertising items.

- F. We ensure that when business is placed with any company in which a DMC employee has a family relationship, that no conflict of interest exists. Nor shall any employee have a reporting relationship to relatives. Information about any potential conflict of interest must be disclosed in advance and written permission secured from the appropriate DMC authority. Such permission is not given if the practice violates applicable laws or policies.
- G. We will avoid frequent acceptance of elaborate meals, refreshments or entertainment from vendors.
- H. We will not accept outside employment (“moonlighting”) unless that employment is disclosed to management. If by the terms of your employment, you are deemed to be a certifying employee (see definitions) any employment outside the DMC will first be approved in writing by your supervisor.

STANDARD 9

Protecting Property, Assets and Information

We are committed to protecting both our assets, and those assets of others entrusted to us, against loss, theft, destruction, and misuse.

- A. We will protect DMC assets, property, facilities, equipment and supplies as well as the property of others from theft, damages, or other misuse.
- B. We will not disclose information, directly or indirectly, or use it for any purposes except as required in the course of our employment with the DMC.
- C. We will refrain from discussing restricted/confidential information in any public area, such as open office areas, elevators, hallways, cafeterias, etc.

To report any suspicious behavior regarding unethical conduct, unresolved billing issues, fraud, waste or abuse within the DMC call the **Compliance Hotline at 1-888-484-9200.**



DEFINITIONS AND RESOURCES

- A. **Affiliated Person:** Any individual who is associated with a covered operating unit and acts on its behalf but is not an employee of the covered operating unit (e.g. Wayne State University faculty and contract physician when they function as contractors who are responsible for the operation of an operating unit department). DMC Tier 1 Human Resources Policy Manual – HR 501.
- B. **Disclosure or Interest of Board of Trustees Members:**
This policy states that any member of the DMC Board of Trustees has the duty to disclose any duality of interest or potential conflict of interest to the other members of the board. DMC Tier 1 Administrative Policy Manual – Corporate General Policy CG 002.
- C. **Covered Person:** Any employee who holds a position that grants him/her the authority to allocate DMC assets. Also, any employee who holds a position in which their activities or relationships with vendors, providers, contractors, third-party payor, or government entities may present risk of impropriety, lead to a conflict of interest, or the appearance of a conflict of interest. DMC Tier 1 Human Resources Policy Manual – HR 501.
- D. **Diversity:** The DMC holds diversity as a prime value in all aspects of DMC life. We value diversity in our workforce, our physicians, our patients and the communities we serve.
- E. **Drug and Alcohol Policy:** This policy defines the conditions under which drug and alcohol testing will take place. DMC Tier 1 Human Resources Policy Manual – HR 502.
- F. **Ethics of Business Conduct Policy:** This policy outlines guidelines/rules for conducting business and delivering healthcare in accordance with high ethical standards and compliance with laws and regulations. DMC Tier 1 Human Resources Policy Manual – HR 501.
- G. **Harassment:** this policy establishes guidelines to ensure a work environment free from harassment and provides a mechanism for handling confidential complaints. DMC Tier 1 Human Resources Policy Manual – HR 504.
- H. **Impaired Practitioner:** This is a Medical Affairs requirement for the reporting of health care professionals who are unable to practice their profession in a manner that conforms to acceptable practice/standards.
- I. **Non-Retribution/Retaliation Policy:** This policy encourages employees to report suspected fraud, waste and abuse. It also provides an assurance to such personnel that the system will protect them against any retribution retaliation for

reporting questionable behavior. DMC Tier 1 Administrative Policy Manual, Corporate General Policy – CG 011.

- J. **Prevention of Workplace Violence:** This policy focuses on the prevention of violence through existing safety and educational measures, employee awareness, and support of the Employee Assistance Program. DMC Tier 1 Human Resources Policy Manual – HR 507.

- K. **Protected health Information:** Information that is transmitted or maintained in any form or medium (electronic, paper or oral) that may identify an individual. (i.e. social security number, name, telephone number)

- L. **Research Patient Policies:** These policies are developed through the Wayne State University School of Medicine.

- M. **Relatives:** The term “relatives” includes spouses, parents, children, grandchildren, siblings, aunts, uncles, cousins, nieces, nephews, step-family, legal guardians and grandparents. DMC Tier 1 Human Resources Policy Manual – HR (TBD).



FREQUENTLY ASKED QUESTIONS

1. What should I do if I see a violation?

Report violations immediately. Try to follow the normal “chain of command” in your department. If you’re not comfortable doing this, contact the Corporate Audit and Compliance, or call the **DMC Compliance Hotline at 1-888-484-9200**.

2. Will a call to the DMC Compliance Hotline show up on a caller ID?

No. Calls to the DMC Compliance Hotline are never traced. Employees are assured that devices such as call I.D. are never used and you’ll remain anonymous unless you choose to identify yourself.

3. What kind of information should I report?

Report fraud and ethical abuses such as inappropriate billing, inappropriate relationships with vendors, etc.

4. How will I know the violation has been corrected?

All allegations of fraud and abuse will be investigated thoroughly. If the problem was in your immediate work area, you may see a change in procedures or potentially a change in personnel.

5. Can I accept season football tickets to Ford Field from a vendor that I do a lot of business with?

No, you should accept a gift of this type. Only gifts of nominal value should ever be accepted. And, it is best never to keep any personal gifts.

6. Someone wants to pay me \$200 to design a web page for their home-based business, but since I don’t have computer at home, I want to use my computer at work during non-work time. Can I do this?

No, use of DMC property for personal business is not permitted. In other words, you may not use DMC assets for someone else’s business.

7. I am a RN on a med-surg unit where we do lots of blood transfusions. However, my religion does not permit blood transfusion, so I always ask not to participate in this procedure. So far, its been allowed, but my supervisor says I may have to participate in the future. Do I have to?

The DMC’s philosophy is to respect your – and everyone’s- religion. The DMC, and your supervisor, will make every attempt to meet your request.

However, if a patient's care could be compromised without your assistance, you will be required to participate in the procedure.

- 8. My supervisor sends me e-mail messages that are suggestive and offensive. When I discussed this issue with him he did not take me seriously. He continues to send me these offensive e-mails. I no longer want to open his e-mails, yet I must in order to do my job. I am afraid to take this issue further because he does my annual performance review.**

The supervisor's behavior described above is inappropriate conduct. The DMC will not tolerate any type of sexual harassment. Sharing sexually suggestive e-mail messages or other unwelcome sexual advances do not belong in the workplace. If you encounter unwelcome sexual advances, you can address it using your normal chain-of-command or you may directly call Human Resources or the DMC Compliance Hotline.

- 9. I have a family member who has recently received treatment at the facility where I am employed, however he is not telling the family about his condition. May I access his records so I can explain his condition to my family?**

No. Access and use of protected health information is only for those persons who have a need to utilize the information to fulfill the tasks of their assigned job. If your job requires you access this information, you must not disclose this confidential information to his family members.





DMC provides the hotline as a service to its affiliates, contractors, employees, patients, vendors and others who want to assist in improving the DMC. The hotline allows you to call, without revealing your identity and without fearing retaliation, if you suspect any of the following:

- **Inaccurate Billing Practices and Documentation**
- **Activities Resulting in Harm to the Environment**
- **Conflicts of Interest**
- **Inappropriate Business Deals**
- **Sexual Harassment**
- **Misuse of Practice Group Property**
- **Fraud, Waste and Abuse**
- **Violation of Privacy & Confidentiality of Patient Information**

Calls made to the hotline are answered 7 days a week/ 24 hours a day by an out-of-state professional hotline service.

All callers will remain anonymous, unless callers choose to identify themselves.

Although your complaints about job-related difficulties, such as payroll and non-discipline related issues, are very important to us, the hotline is not set up to handle these calls. For assistance with these matters follow the DMC Employee Problem Solving Procedure. (DMC Policy #HR505)



Your Input Is Valuable
And **Can** Make
a Difference

January 2002