



Code of Conduct



VCUHealth™

VCU Health System



VCU Health

North Hospital

**VCU
Massey
Cancer
Center**

Research Laboratory

**I-75 SOUTH
I-64 SOUTH
Washington Petersburg**

**RAMP
25
MPH**

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Message from Leadership



Welcome to VCU Health System.

When I started here over fifteen years ago, a leader gave me a bit of advice – “As a compliance professional, you can NEVER assure compliance.” As a new professional in this field, I thought this statement

odd until I realized how correct they were. I CANNOT assure your actions as a team member align with our mission, vision and values. I CAN provide you with the tools that show you how your actions CAN align.

The Code of Conduct on the following pages is your first tool in your toolkit. Use it as your guidebook to navigate the everyday and the unusual scenarios you come across. If your question is not answered, use the methods provided to contact the Compliance Services team. We are here to help.

As a VCU Health System team member, your actions SHOW our patients, visitors, fellow team members and vendors how you align with our Code of Conduct. Reading, understanding and agreeing to follow the Code of Conduct at hire and annually affirms your commitment to the mission, vision and values of the Health System. Part of that commitment is a continued willingness to ask questions, voice concerns and to challenge the notion of how things are done.

The Code of Conduct is the foundation of what we do, and the expectations within it should be woven into every decision and action taken. Together, and with a unified set of values, we can accomplish incredible things.

A handwritten signature in black ink that reads "Jill McCormack". The signature is written in a cursive, flowing style.

Jill McCormack, MSHA
Chief Compliance & Privacy Officer





Mission Statement

We preserve and restore health for all people of Virginia and beyond through innovation in service, research and education.

Vision

We lead the nation in quality, affordability, and impact as a trusted and preferred academic health system.

About Our Code of Conduct

What is the Purpose?

Our Code of Conduct highlights some of the laws, regulations, and VCU Health System policies and ethical standards that team members are expected to follow. The Code provides guidance for team members to assist the organization in fulfilling its ethical responsibility to patients, each other, payers and other stakeholders that conduct business with us. It demonstrates our belief in service with integrity.

Our actions shape the public's view of VCU Health System, which is why it is important that you take responsibility to act ethically and with integrity in all situations.

Additionally, our Code helps us identify potential issues, list resources where you can find more information and outlines our reporting options when we have a concern. It also serves as a reminder to treat others with the highest respect and professionalism.

Our Code is a part of our health system wide compliance program, supported by the VCU Health System Board of Directors and senior leadership. Compliance Services oversees our ethics and compliance program with the assistance of the Audit and Compliance Committee of the Board of Directors.

Who Must Follow our Code of Conduct?

Our Code applies to team members at every level. Team members include anyone, paid or unpaid, who perform some function for or on behalf of VCU Health System, and who has access to the premises, information and/or electronic information systems. This includes, but is not limited to, vendors, contractors, physicians, faculty, researchers, students, consultants, volunteers, board members and business associates of VCU Health System.

What is Included in the Code?

This guidance sets expectations for professional conduct and gives direction in making the commitment to serve with integrity. However, the Code may not provide easy instruction in situations given the nature of the health care environment and the difficult issues we often face. Individual departments/divisions/offices may have more specific guidance on the topics discussed within the Code. You can find much of that guidance on the area's SharePoint site.

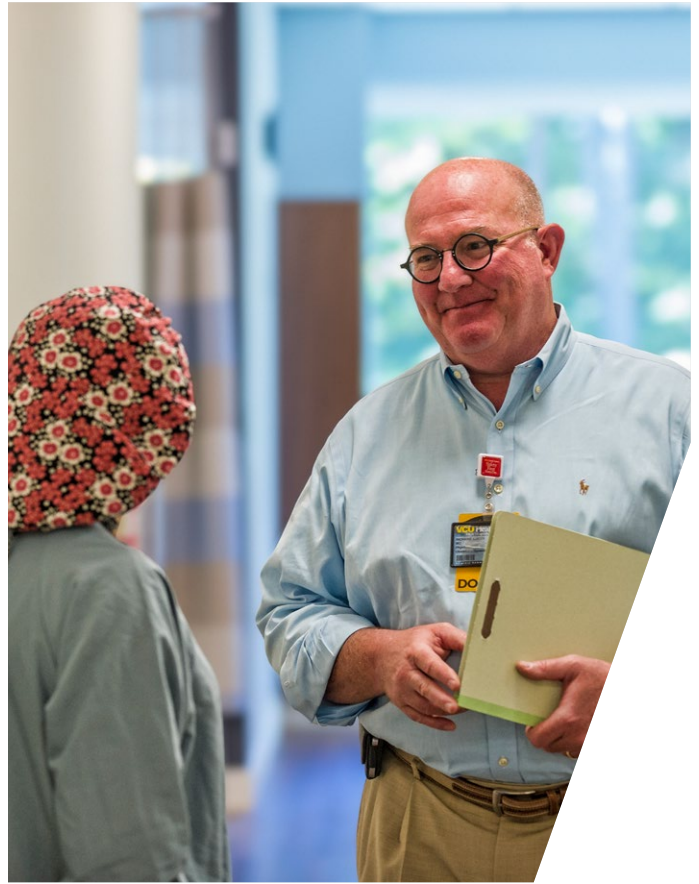
Seeking Guidance

When you have concerns or questions, you have options. You are encouraged to use the resources on [page 16](#) to seek guidance.

Culture of Compliance and Integrity

We are committed to an environment that prevents, detects and resolves conduct not meeting the expectations of the law, our policies or health care program requirements. Our Code is our guide for integrity and ethical conduct. The basis is a policy of zero tolerance for dishonesty, unsafe behavior, and fraud and abuse while using proactive approaches to eliminate waste. We show this through our compliance program and policies that support a continuous process of education, detection and correction.

You have an important role to promote a culture of integrity. It is important that you have the tools necessary to do the right thing. To do so, you have to be aware of the policies and procedures to guide your behavior. Health System policies and procedures should guide your behavior and decisions. It is your responsibility to be familiar with these policies and to be sensitive to any situation that could lead you or others to engage in actions that would violate them. When representing VCU Health System, your actions should always reflect positively on your profession and our mission.



STAR Service Behaviors

Our behaviors demonstrate the Health System Values. We commit to the following:

- **Safety** – team members are expected to always put safety first as evidenced by being alert, proactive, using error prevention tools, communicating clearly and consistently observing organizational policies and procedures related to safety practices.
- **Teamwork** – team members work collaboratively with others to provide a safe, caring, respectful and comfortable experience for all.
- **Accountability** – team members accept responsibility for their actions and behaviors and respectfully hold others accountable to VCU Health System standards.
- **Relationships** – team members show respect for others and appreciation for cultural differences.
- **Service That Shows Caring** – team members put the needs of others first by demonstrating a warm and caring manner when interacting with others.



Ethical Standards

We are committed to an environment of uncompromising integrity and ethical conduct. Our actions are guided by these principles and values:

Respect: We respect individuals, diversity and the rights of others.

Honesty: We act and communicate honestly and candidly. We do not mislead others.

Excellence: We strive for excellence in all that we do.

Responsibility and Accountability: We are responsible for our decisions and actions.

Stewardship: We are good stewards of the resources entrusted to the Health System.

Compliance: We understand and comply with the codes, laws, regulations, policies and procedures that govern the Health System.

We recognize that our decisions and actions reflect not only on our individual reputations, but also on the reputation of the Health System. Our actions are guided by these ethical principles even when confronted with personal, professional, social or economic pressures.

Doing the Right Thing

Meeting VCU Health System's ethical standards is important. In addition to following the law, you are required to display ethical conduct, well above the minimum requirements of the law. We want our patients, team members and business partners to be comfortable with our organization, and we want you to feel good about yourself and your team members. Doing the right thing helps us achieve that goal!

Our Team Member Commitment:

- Know the policies related to your job role
- Ask clarifying questions about policies and how they apply
- Report compliance concerns promptly
- Seek resolution if your reported concern is not resolved
- Cooperate with Health System investigations into concerns involving violation of organizational policies, laws, regulations, etc.
- Complete training sessions that keep you informed of the policies and procedures related to your role

If you are unsure of the right course of action, use the ethical decision diagram on [page 6](#).

The Relationship: Ethics and Integrity

Compliance:

- The rules and regulations
- Why we do what we do

Ethics:

- Our moral code or compass
- How we see right and wrong
- How we think about rules

Integrity:

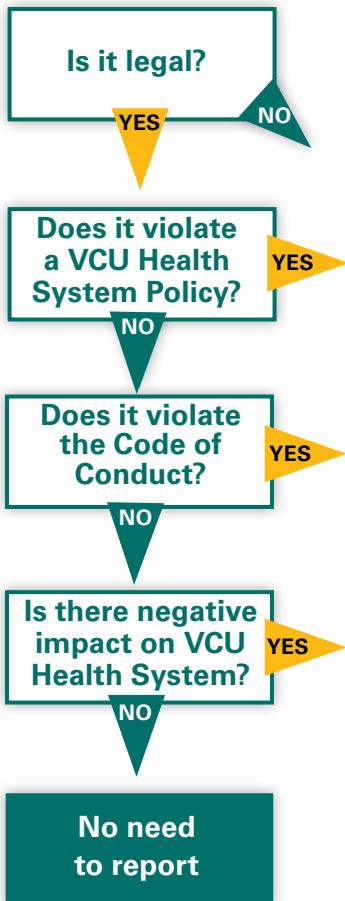
- The actions that reflect who we are
- What we do in the work place based on honesty and truth
- How we act on the rules

Values:

- STAR Service



When to Report



**Not sure?
Just ask!**

If you are unsure that a decision or action meets the expectations of the law, VCU Health System policy and procedures or the Code of Conduct:

You are encouraged to use the resources on page 16.

Ethical Standards: Litmus Test

Answering “no” to one of these questions does not necessarily make the decision unethical, but it indicates you should seek additional input before taking action.

Respect: Have you considered how this decision or action may negatively affect VCU Health System or others?

Honesty: Does this decision demonstrate personal and professional integrity?

Excellence: Is this the best option for VCU Health System and its stakeholders? Do you feel confident that you could effectively explain or support your decision?

Responsibility & Accountability: Would you feel comfortable if your decision was made public?

Stewardship: Is this the best use of VCU Health System resources?

Compliance: Does this decision comply with the spirit of applicable laws, regulations and VCU Health System policy?

Business Practices

Our Code provides us the framework for understanding the expectations of the complex regulatory system. It is essential that our business practices meet the rules and regulations applicable to us. The Code gives us the tools to make the right decision. As a team member, you have a duty to speak up whenever you encounter actions that do not display the Health System's mission and values, policies and procedures, or the rules and regulations. Some federal and state regulations to be aware of include Deficit Reduction Act (2005), Federal False Claims Act and Virginia Fraud against Taxpayers Act. For more information on these laws and regulations, see the **Compliance Services** intranet site at <https://intranet.vcuhealth.org/sites/compliance-services>.

Q: Where can I Find the Health System policies I am expected to follow?

A: You can find policies related to your job responsibilities at

<https://vcuhealth.policymedical.net>.

You can find Human Resource policies by logging into HR4U.

REMEMBER, THERE IS ALWAYS HELP MAKING THE RIGHT CHOICE!

Does the situation involve...

- Inappropriate behavior
- Harassment
- Payroll
- Fair treatment
- Disciplinary issues
- Team member conflict
- Conflicts of interest involving solicitation, including selling products
- Discrimination or retaliation

See compliant procedures on **HR4U**.

For questions contact **Employee Relations (804) 628-HR4U**.

Does the situation involve...

- HIPAA privacy and security violations or other privacy issues
- Lost or stolen device containing PHI (immediately report to IS Help Desk at **828-6447**)
- Fraud, waste or abuse
- Issues of retaliation
- Violations of Ethical Standards, the Code of Conduct or Policies and Procedures
- Conflicts of interest (examples: giving or accepting gifts, business courtesies or having outside interests)

Compliance Services

complianceservices@vcuhealth.org or
Compliance Helpline **1-800-620-1438**



Conduct Expectations and Standards

Confidentiality

We have a responsibility to deliver high quality and safe care. We are responsible for protecting patient medical information. Patients should feel confident that we treat their sensitive medical information in accordance with federal and state privacy laws and regulations, specifically Health Insurance Portability and Accountability Act (HIPAA) requirements. We do not tolerate breaches of confidential information and work proactively to safeguard patient information.

Our commitment to patient privacy extends to spoken, written and electronic formats. We will not access, use or disclose a patient's protected health information without the appropriate business reason (treatment, payment or healthcare operations). Protecting patient privacy is an individual commitment we must all make.

In your role at VCU Health System, you may learn of or have access to confidential or proprietary information. Confidential and proprietary information of VCU Health System are valuable assets. While you may have access, as it is related to your job responsibility, it should not be shared with others outside or internally with individuals who do not need to know the information. Confidential information includes information in any format, including in part written, electronic, verbal and other various types of media. Your obligation to safeguard this information continues even after employment here.

Patient Care and Treatment

We provide care to patients based on the accepted standards of care and medical necessity, not the patient's ability to pay. Giving quality care involves telling the patient about the options and risks related to the care they may receive and obtaining consent of the patient, their legal representative or family for procedures. We respect the rights of patients to be involved in their care. We focus on patient centered care that requires health care providers, to the extent possible and appropriate, to involve patients and family members in the clinical decision-making and plan of care process.

Q: Can another team member look at my medical record? Is my information confidential too?

A: A team member may only look at your medical record if they are involved in your care. **As our patient, your information is confidential too.**

Data Security

We are committed to preserving an environment that encourages superior patient care, education and research through the responsible use of information technology resources. With the integration of technology into our everyday lives, we are faced with new threats against the security and privacy of our information. In order to prevent the loss and theft of our information, you must share in the responsibility to protect our resources from these threats. Protection may be directed by legal, contractual, financial or other health system considerations.

To protect our information, you must look for and raise concerns about security incidents, such as:

- Sharing of personal passwords
- Possible theft or loss of electronic or paper data
- Theft or loss of devices
- Phishing emails and scams
- Malicious software infections that may lead to data theft
- Unauthorized access to email, files, physical space or computing resources



Behavioral Standards

We believe in providing quality patient care in an environment, which respects the rights and dignity of patients, team members, visitors and others. We are all responsible for displaying performance and conduct that supports this goal. We are responsible for knowing the policies and procedures that govern our behaviors as a Health System team member. These behaviors are defined by the Code of Conduct, Ethical Standards and STAR Service. You may find more information regarding the behavior standards in the **Standards of Behavior and Performance** located at www.HR4U.vcuhealth.org. If you believe you have witnessed or have been subjected to behavior that does not meet the expectations of the Health System, you are obligated to report it. Be sure to know your reporting options. Information on reporting may be found on [page 16](#). VCU Health System has a non-retaliation policy. Retaliation against individuals for raising in good faith concerns or participating in an investigation regarding violations of the Code of Conduct or other Health System policies is prohibited. If you have questions or concerns regarding the team member expectations or policies, be sure to seek help using the sources identified in the Code.

Workplace Safety

Safety is the core value of STAR Service Behaviors. Our vision is to be America's safest and most caring health system. There is a goal of zero events of preventable harm to patients, team members and visitors. To do this, team members are responsible for practicing Safety First, Every Day, as it demonstrates our commitment to improving the culture of safety and developing high reliable practices across the health system. Safety First focuses on improving the safety culture and reliability of the health system by using highly reliable principles and practices.

Your actions should always reflect our Safety First culture. You are responsible for reporting safety events, including near misses. Team members are responsible for knowing the safe behaviors and practicing error prevention tools. These tools include the Behaviors Expectations for Error Prevention (BEEP) Tools and how these behaviors are used in the work environment to keep patients, team members and visitors safe. For more information, please visit the **Safety, Quality, Service** intranet site: <https://intranet.vcuhealth.org/sites/safety-quality-service/>.

Conflicts of Interest

A conflict of interest occurs when you have a situation that creates or gives the appearance of affecting your ability to perform your job duties. You are expected to conduct professional and personal business in a manner that avoids actual or perceived conflicts of interest. You should not put yourself in a situation where your personal or financial interest come before your responsibilities to the Health System.

The following are examples of conflicts that may arise during your employment:

- Creating an excessive demand upon your time and attention while scheduled to be at VCU Health System
- Using your position within the organization to influence a VCU Health System decision in which you have a financial interest; using the VCU Health System name and/or logo to promote or sell non-VCU Health System products or services; or using the VCU Health System name and logo without authorization
- Promoting or receiving an improper financial or other benefit, either directly or indirectly, to you, another employee, family member, a VCU Health System customer or patient, partner, contractor or service provider

In addition to the above examples, you are responsible for ensuring that your or your family members' financial interests or investments do not create or appear to create a conflict. Each of us is responsible for seeking guidance prior to making an investment if you believe it may be in question.

The above are limited examples of potential conflicts of interest. Inquiries regarding potential or perceived conflicts of interest and transactions constituting a conflict of interest must be directed to the Office of General Counsel or Compliance Services.

Q: I am thinking of taking a second job. Is this a conflict of interest?

A: Remember, a conflict of interest may be anything that creates or gives the appearance of affecting your ability to do your job. Make sure you seek the appropriate approvals for the second job. More information may be found at www.HR4U.vcuhealth.org.

Q: A patient gave me a \$50 gift card for providing excellent service during their stay. Can I accept it?

A: While this is a great gesture, accepting this type of gift from a patient is not ok. Make sure you are aware of our policy on Gifts and Entertainment referenced below.

Gifts, Business Courtesies and Entertainment

It is important that team members make business dealings and relationships involving the Health System transparent. Decisions must be based on sound business practices and Health System values and shall not be based on personal gain. Team members are not to build a business or personal relationship based on inappropriate use of business courtesies, gifts or entertainment. Gifts and entertainment include anything of monetary value such as discounts, travel expenses, loans, cash, services, transportation, tickets and gift certificates/cards. Receiving remuneration in exchange for a patient referral or service is not only against Health System policy, but also against the law. Remuneration is defined as anything of economic value. This includes kickbacks, bribes or rebates. Team members should be aware of the policies and laws related to gifts and business courtesies. These laws include Anti-Kickback and Stark.

Team members should disclose the offer/receipt of an inappropriate gift or business courtesies using the information found in the section Asking for Guidance and Sharing Concerns. For more information on gifting, see policy FN.PP.005, **Gifts and Entertainment**.





Community Involvement and Political Activities

VCU Health System encourages the participation in community and charitable activities. However, our personal opinions should not be represented as those of VCU Health System or impose our personal beliefs or opinions on other team members or patients. Be mindful of activities that may be considered solicitation. Team members should be aware of the human resources **Non-Solicitation** policy (HR.AD.002) when considering activities. These may include but not limited to selling goods/services or conducting membership drives.

VCU Health System recognizes and respects the political diversity of its team members. Activities of this nature should be conducted on your own time and without using VCU Health System resources. In addition, team members are not to use his or her position with the Health System to further political activity on any person or group.

Legal Requests and Government Inquiries

We respond to all legal requests without unreasonable delay. If you receive a legal request or subpoena, please contact the Office of the General Counsel. If you receive a Freedom of Information Act (FOIA) request, please contact our FOIA officer at (804) 828-0531 or visit www.vcuhealth.org/news-center/foia-requests/foia immediately.

Q: What should I do if contacted by a government official?

A: If a government official contacts you, be sure you seek assistance immediately. You should never put yourself in a position to give information you may not be authorized to give.

The Health System must respond within a specified time to these inquiries. For this reason, you must notify the appropriate department as soon as possible to ensure timely response. Remember that you must not begin searching for or copying documents before talking to the appropriate department.

We comply with all valid governmental requests and processes, and our interactions with government authorities are honest, respectful and timely.

If a government official asks you to provide non-routine information or participate in a review, contact your immediate supervisor, the Office of General Counsel, Risk Management or Compliance Services immediately before taking any action. You will be provided with assistance to ensure we take appropriate steps to comply with the request.

You have a legal right to consult with your supervisor, the Office of General Counsel or Compliance Services, before answering questions surrounding an investigation.

You are expected to cooperate with any government, internal, or external investigation; and must never alter or destroy VCU Health System records in anticipation of an investigation. Staff should also never attempt to persuade other team members to make false or misleading statements to an investigator or to alter or destroy records.

Records Retention

Business records and documents, including hardcopy and electronic, must be retained or destroyed according to our records management policy, LG.AD.003, **Retention and Destruction of Records and Information**. You are expected to know and follow the appropriate retention schedules that apply to the records you create and maintain.

You must not knowingly destroy or discard information that is subject to a legal hold. All information relevant to a legal action must be retained until the hold is lifted. Strict compliance with these expectations helps protect the Health System and individual team members.

Intellectual Property

As a part of our mission and purpose, we routinely create and provide ideas, inventions, discoveries and programs unique to our environment. This work is referred to as intellectual property. Any intellectual property or assets created during the course of employment or with the use of employer funds, space or equipment are the property of the employer. Each team member is responsible for safeguarding the organization's intellectual property and confidential information by avoiding any unauthorized disclosure to others (either internally or externally to VCU Health System), who do not need to know the information for a legitimate business reason. This responsibility continues even after employment ends.

Accounting Compliance and Asset Management

Health System resources are intended to help us achieve our mission and vision. Reasonable care is to be used to ensure resources are not wasted or misused, and take advantage of opportunities for improving performance and reducing costs. Remember to be alert and report any misuse of VCU Health System resources using the appropriate reporting tools listed in our Code of Conduct's **Share a Concern**. Team members responsible for the preparation and submission of cost reports are to make sure that cost reports submitted to government and third party payers are properly prepared and documented in accordance with applicable federal and state laws and regulations. Team members with purchasing responsibilities should ensure they are familiar with the guidelines related to their role.

As good stewards of our resources, remember purchases should:

- Have appropriate approvals
- Be in line with our mission
- Priced competitively
- Conducted fair and impartially



Antitrust and Competitive Behavior

VCU Health System and its team members comply with applicable antitrust laws. We avoid activities that may pose unwarranted risks of litigation, government investigation or damage to our professional reputation. Antitrust laws protect patients and providers by promoting competition and ensuring that patients have health care choices that reflect an open market. Team members should be knowledgeable about activities that may be in violation of antitrust laws.

Billing and Coding Integrity

VCU Health System is committed to full compliance with laws and regulations relating to billing, coding and reimbursement. If you are responsible for the charging, coding, billing, documentation and accounting for patient care services for the purpose of billing government, private or individual payers you must comply with applicable state and federal regulations, payer contracts and policies and procedures.

VCU Health System only bills for services actually provided and shall collect only the amount to which it is entitled. Billing for services not provided or misrepresented is not tolerated.

Asking for Guidance and Sharing Concerns

Duty to Speak Up

You have a responsibility to voice your concerns when you are unsure of the right course of action, need guidance or believe misconduct may have occurred. Speaking up in good faith shows a commitment to a work environment based on integrity. It is the right thing to do and allows everyone the opportunity to do the right thing, the right way. For more information on the duty to report, see policy LD.RM.002, **Compliance Reporting**.

We have a duty to recognize and report misconduct without reasonable delay. Examples that should be reported include actual or suspected:

- Violations of government regulations
- Violations of VCU Health System policy and procedures
- Violations of the Ethical Standards, STAR Service Behaviors or the Code of Conduct
- Fraud, waste or abuse issues
- Patient mistreatment, abuse or neglect

When you have concerns, you have options

- Direct Supervisor or Department Manager
- Employee Relations
- Compliance Services
 - Office: (804) 828-0500
 - Email: complianceservices@vcuhealth.org
- The Compliance Services Helpline 1-800-620-1438 is available 24/7/365 and confidential
 - Web based reporting <https://app.convercent.us/en-us/LandingPage/caa17cba-31d8-eb11-a840-000d3afda485>
- The Office of the General Counsel
 - Office: (804) 828-9010

“What Happens When I Voice a Concern to the Compliance Services Office?”

Team members have the option of contacting Compliance Services directly. You may contact the

office by phone, email, online or in person. Your concerns are taken seriously. The information you share is treated confidentially.

You have the option to file an anonymous report; however, there may be times when Compliance Services will need to follow up with you or you may want information regarding the outcome of your report.

“What is the Compliance Helpline?”

The Compliance Helpline is a confidential reporting method operated by a third party. The Helpline is available 24 hours a day, 365 days a year.

If you are unsure where to go to ask a question, are uncomfortable using the other resources identified in the Code of Conduct or wish to remain anonymous, you may call or enter a report to the Compliance Helpline.

Reports submitted through the Helpline are received and reviewed by VCU Health System Compliance Services in collaboration with other areas as needed. These areas may include, but are not limited to, Patient Relations, Employee Relations, Risk Management or Information Security.

“What Happens When I Call the Helpline?”

When you call the Helpline, a third party representative will ask you a standardized set of questions. The questions summarize your concern for review by Compliance Services. You will receive a unique user name and asked to select a password so that you may return to answer questions, offer additional information or check the status of your report. The concern is then sent to Compliance Services for review.

“Can my information (phone number, computer IP address, etc.) be tracked when reporting to the Helpline?”

No. Information submitted to the VCU Health System Helpline is secure and anonymous. If you choose to identify yourself, the information will be treated confidentially to the extent possible.

Good Faith Reporting

By seeking guidance, sharing a concern in good faith or participating in a workplace investigation, you are adhering to the Code of Conduct and doing the right thing. We have a zero tolerance policy for retaliation in response to these activities. Knowingly making a false report or reporting with ill intent or reckless disregard of the truth is subject to disciplinary action.



Any team member engaging in retaliation will be subject to progressive disciplinary action procedures. If you suspect retaliation in response to sharing a concern or participating in an investigation, please contact Compliance Services or make a report through the Compliance Services Helpline.

Compliance Education and Training

Training and education for all team members are essential to fulfilling each team member's compliance responsibilities. Compliance Services provides required training and specialized training to meet the needs of the Health System. Training is provided on the components of a compliance program, appropriate billing and coding, applicable compliance regulations and privacy. At times, additional training may be required depending on a team member's responsibilities. Compliance education is only effective at preventing wrongdoing if all team members participate. For more information on compliance education requirements, see policy HR.EM.012, **Compliance Education**.

Where to Stay in the Know

Health System Policies:

<https://vcuhealth.policymedical.net>

Compliance Services:

<https://intranet.vcuhealth.org/sites/compliance-services/>

Office of Inspector General (OIG):

<https://oig.hhs.gov/>

Centers for Medicare and Medicaid Services:

<https://www.cms.gov/>

As a team member, remember your responsibilities and commitments. Each day we should embrace the Code of Conduct and deliver service that is based on ethics and integrity. We should remember the tools that help us do the right thing in our daily duties. Remember, you are VCU Health System. We are VCU Health System.







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Richmond, Virginia 23298-0471
Phone: (804) 828-0500

Updated 12/21/22