



CODE OF CONDUCT

STAY TRUE TO OUR MISSION, VISION, VALUES AND PROMISE.

Your official guide to maintaining our high standards of conduct and ethics

HARRISHEALTH SYSTEM



A MESSAGE FROM ESMAEIL PORSA, MD

DEAR HARRIS HEALTH FAMILY,

As we strive to become a high-reliability organization where zero patient harm is not only a possibility but an expectation, we must also stand firm against any wrongdoing be it ethical, legal, moral, financial or otherwise. We are honored to serve some of the most vulnerable in our community. With this honor comes the trust and the duty that we conduct ourselves beyond reproach. I call on all of us to continue this journey with steadfast determination and tireless vigilance.

To help us achieve these goals, the Harris Health System Code of Conduct explains our expectations and our policies. It gives us the tools to confidentially report any ethical or legal violations that you know about, suspect or become aware of, without any fear of retaliation.

I encourage you to read and become familiar with our Code of Conduct. With your personal commitment, we are well on our way to becoming the premier public academic healthcare system in the nation.

Sincerely,

Esmaeil Porsa, MD

President & Chief Executive Officer
Harris Health System





Our Code of Conduct puts our Mission, Vision, Values and Promise into practice. It provides standards of conduct that must be followed by everyone who works at or with Harris Health: Our Board of Trustees, employees, members of our medical staff, trainees, contractors, volunteers and vendors.

Our Code of Conduct aligns with and supports **Harris Health's strategic plan** and pillars as well as Harris Health policies and procedures.



OUR MISSION

We are a community-focused academic healthcare system dedicated to improving the health of those most in need in Harris County through quality care delivery, coordination of care, and education.

OUR VISION

We will become the premier public academic healthcare system in the nation.

OUR VALUES

Harris Health values **QUALITY**

Quality and Patient Safety

United as One Harris Health System

Accountable and Just Culture

Leadership & Integrity

Innovation, Education, Research

Trust, Recognition, Respect

You: Patients, Employees, Medical Staff

OUR PROMISE

To provide high-quality healthcare by knowledgeable and highly trained staff;

To provide prompt, friendly and courteous service;

To be sensitive and responsive to our patients' needs and concerns and the needs and concerns of their family members and friends; and

To provide a clean, comfortable and safe environment in all our facilities.

OUR STRATEGIC PILLARS

We will strive to accomplish the goals and objectives of each strategic pillar by aligning behavior and actions in furtherance of each pillar.

Our strategic pillars are:

Quality and Patient Safety
People

One Harris Health System
Population Health Management
Infrastructure Optimization
Diversity, Equity and Inclusion



THE ROLE OF CORPORATE COMPLIANCE AT HARRIS HEALTH

The Office of Corporate Compliance is responsible for developing and fostering a culture of ethical conduct. The Office of Corporate Compliance is charged with the duty of providing education, training and guidance to workforce members and implementing a compliance program that prevents, detects and corrects accidental or intentional violations of federal and state laws or regulations and/or Harris Health policies and this Code of Conduct.

Carolynn Jones, Harris Health's Chief Compliance and Risk Officer, provides executive-level direction for the compliance program and is responsible for incorporating the compliance program within Harris Health's operations and programs through collaboration with executive leadership. The Chief Compliance and Risk Officer also has a direct line of communication with and independent responsibility to the Board of Trustees.

The Board of Trustees' Compliance and Audit Committee assists the Board of Trustees in its oversight responsibilities of the Office of Corporate Compliance's efforts to cultivate an ethical and compliant culture and set the tone for a culture of compliance within Harris Health.

Carolynn Jones, JD, CHC (She/Her/Hers)

EVP, Chief Compliance & Risk Officer
Harris Health System

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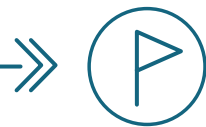
OUR RESPONSIBILITIES UNDER THE CODE OF CONDUCT

Everyone who works at or with Harris Health has a responsibility to perform his or her job duties in compliance with the Code of Conduct. All potential violations of the Code of Conduct should be reported pursuant to the **4-Step Reporting Process**.

Harris Health has adopted a **just and accountable culture**. This means that when a violation of the Code of Conduct is reported to the Office of Corporate Compliance, the violation is treated as an opportunity to understand the behavioral choice and/or system failures that led to the violation.

LEADERSHIP RESPONSIBILITIES UNDER OUR CODE OF CONDUCT

Managers and supervisors have the following additional responsibilities under our Code of Conduct:



BE AN EXAMPLE

Promote the Code of Conduct in daily activities by complying with the Code of Conduct. Specifically, managers and supervisors should know, understand and follow the statutes, rules and regulations that govern your area of responsibility. Managers and supervisors should also report any and all potential violations of the Code of Conduct.



BE ACCESSIBLE

Managers and supervisors should have an open-door policy so that workforce members feel comfortable asking questions about the Code of Conduct or raising concerns regarding potential violations.



BE RESPONSIVE

Managers and supervisors should identify compliance risks and respond in a timely manner to address the identified risks. Further, managers and supervisors should give prompt answers to any questions or concerns regarding the Code of Conduct or refer questions to the Office of Corporate Compliance.



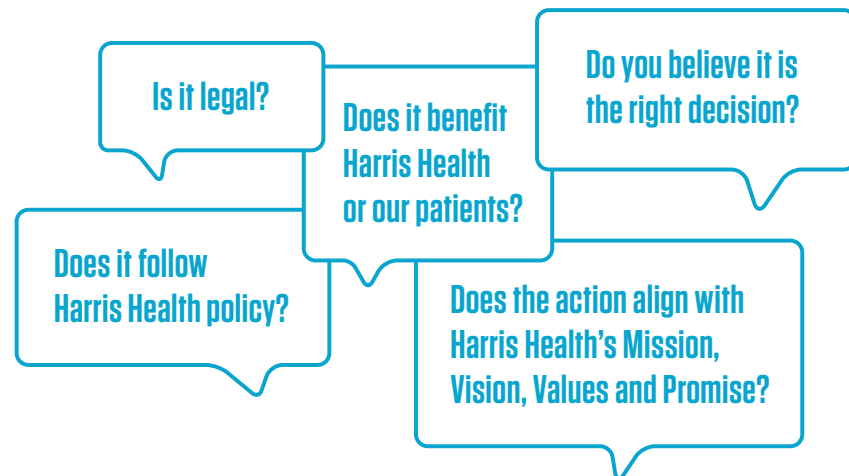
QUIZ: WHAT SHOULD I DO?



There may be times when you are unsure whether an activity or situation is unethical or illegal. Certain words and phrases raise “red flags” that an action could violate our Code of Conduct. Specifically, all of the following phrases should send a warning signal to you:

- “Well, maybe just this once.”
- “No one will ever know.”
- “Everyone does it.”
- “No one will get hurt.”

If you are ever unsure what decision to make, use the following quiz to determine whether you are making the right choice for Harris Health and our patients or whether you should seek additional guidance before you act.



If you answered “no” or are unsure of the answer to any of the above questions, you should contact your manager or supervisor, another trusted manager or Harris Health’s Office of Corporate Compliance before you proceed.



REPORTING COMPLIANCE ISSUES

Harris Health has a just and accountable culture ("JAC"). JAC is how Harris Health reacts to and manages human errors, mistakes and violations of laws or regulations. JAC promotes a process where mistakes, errors and/or violations of laws or regulations do not result in **automatic** punishment, but rather result in a process to uncover the source of the error or violation. Errors that are not deliberate or malicious may result in coaching, counseling and education around the error and/or violation, ultimately decreasing the likelihood of a repeated error or violation.

Both Harris Health's Code of Conduct and JAC require you to report known or suspected violations of the Code of Conduct. If you have a question or concern about an activity violating the Code of Conduct by being unethical, illegal or wrong,

use the following 4-Step Reporting Process to report your concerns. >>

Even though Harris Health has a strict Non-Retaliation Policy (discussed below), if you would like to report violations of the Code of Conduct confidentially, Harris Health will keep your identity confidential to the extent possible.

**1**

Talk to your supervisor. He or she is most familiar with the laws, regulations and policies that relate to your specific job responsibilities.

2

If you are not comfortable contacting your supervisor, if you do not receive an adequate response from your supervisor or if both you and your supervisor still have questions or concerns, talk to another member of the management team.

3

If you still have concerns, contact the Office of Corporate Compliance at **346-426-1505** or at **corporatecompliance@harrishealth.org**.

4

If, for any reason, you feel that you cannot follow the above steps, you can always call Harris Health's confidential Corporate Compliance Hotline at **844-565-0621** or use the secure and confidential **EthicsPoint** site. The Corporate Compliance Hotline and **EthicsPoint** site are operated by an independent third party, and the Office of Corporate Compliance only receives information authorized by the caller. The Corporate Compliance Hotline is available 24 hours a day, 365 days a year. Your identity remains anonymous unless you choose to identify yourself. Additionally, the Office of Corporate Compliance keeps your identity confidential to the extent allowed by law unless your identity is critical for the resolution of an investigation. Harris Health's Corporate Compliance Officer reviews, investigates and responds to all calls made to the Hotline.

OUR NON-RETALIATION POLICY

Harris Health does not tolerate retaliation against anyone who, in good faith, reports an actual or suspected violation of the Code of Conduct. Retaliation occurs when unfair consequences such as disciplinary actions or unfavorable pay or promotion decisions are made against an individual who has reported alleged violations of laws, rules, regulations, Harris Health's Code of Conduct or Harris Health policies and procedures. Any workforce member who conducts or condones retaliation against another workforce member for reporting an actual or suspected violation of the Code of Conduct will be subject to disciplinary action, up to and including termination. If you believe that you have been retaliated against, please report your concern using the reporting process explained above.



STEWARDSHIP

Protecting our patients' information and Harris Health's information and resources to enable Harris Health to optimize its infrastructure, and protecting Harris Health' patients by creating an environment where zero patient harm is the expectation through the provision of safe and high-quality care.



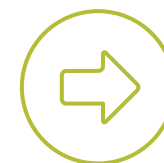
STANDARD OF CONDUCT: SAFEGUARDING PROTECTED HEALTH INFORMATION

OUR COMMITMENT

We are committed to safeguarding our patients' protected health information in accordance with state and federal privacy and security laws and regulations.

YOUR RESPONSIBILITIES

- » To protect our patients' privacy by only using, disclosing or accessing a patient's protected health information, including their electronic medical record, if it is necessary to do your job (for treatment, payment or healthcare operations purposes, for example) and only using or disclosing the minimum amount of protected health information necessary to do your job.
- » To always obtain a patient's authorization to use or disclose their protected health information if the use or disclosure is not for treatment, payment or healthcare operations or unless the use or disclosure is otherwise permitted under state or federal privacy laws and regulations.
- » To be sensitive to your surroundings when you are sharing protected health information and to always speak in a low and quiet tone if you are not in a private area.
- » To always properly dispose of protected health information in the designated locked shred bins.
- » To report any known or suspected impermissible or improper use, disclosure of or access to protected health information to the Office of Corporate Compliance as soon as possible, but no later than 24 hours after discovering an actual or suspected impermissible or improper use, disclosure or access.
- » To never share your passwords or credentials with anyone for any reason.
- » To maintain up-to-date knowledge of privacy and information security rules by completing Harris Health's annual privacy and information security education.





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STANDARD OF CONDUCT: SAFEGUARDING PROTECTED HEALTH INFORMATION

FAQs

What is protected health information?

Protected health information is information that identifies a patient or could be used to identify a patient **and** relates to that patient's healthcare in any way. Protected health information can be in any format, including paper, electronic or oral. Examples include After Visit Summaries, prescriptions, any information included in the patient's electronic medical record and information discussed between healthcare providers.

Can I disclose a patient's protected health information to a patient's family member(s) or friend(s)?

Yes; however, you may only disclose protected health information to a patient's family member(s) and/or friend(s) that is **directly relevant** to the patient's family member's or friend's involvement in the care of the patient and so long as the patient has agreed or has been given an opportunity to object and did not object. For more information regarding these disclosures, please see **Harris Health Policy 3.11.203, Use and Disclosure of Protected Health Information to Persons Involved in the Patient's Care and for Disaster Relief Purposes.**

Can I take a photograph of a patient or make a recording of a patient?

Yes, you may take a photograph of a patient or make a recording of a patient, **provided that:** (1) the patient's written authorization (use **Harris Health form no.282758**) is obtained **prior to** taking the photograph or making the recording; or (2) the photograph or recording is being taken and used for treatment purposes only and is integral to the treatment of the patient; or (3) the photographer or recording is taken to be used for internal education purposes. For more information, please see **Health Policy 3.11.310, Making and Disclosing Photographic, Video, Electronic, Digital, or Audio Recordings of Patients.**

What should I do if I suspect that HIPAA has been violated?

Because the HIPAA privacy rule requires that Harris Health notify affected patients within 60 calendar days of the discovery of a HIPAA breach, you should report your suspicions as soon as possible but not later than 24 hours after discovery to the Office of Corporate Compliance for investigation. You may report HIPAA allegations either: (1) via email to **CorporateCompliance@harrishealth.org**; (2) through Harris Health's Electronic Incident Reporting System (eIRS); or (3) to the Corporate Compliance hotline at **(844) 565-0621** or use the secure and confidential **EthicsPoint** site.



POLICIES TO KNOW

⇒ **Harris Health Policy 3.11.105, Use and Disclosure of Protected Health Information for Treatment, Payment, and Health Care Operations**

⇒ **Harris Health Policy 3.11.104, Sanctions for Failure to Comply with Privacy and Information Security Policies.**

⇒ **Harris Health Policy 3.11.201, Use and Disclosure of Protected Health Information for Facility Directories**

⇒ **Harris Health Policy 3.11.302, Minimum Necessary Standard for Request, Use, or Disclosure of Protected Health Information**

⇒ **Harris Health Policy 3.11.306, Permitted Use and Disclosure of Protected Health Information Without a Patient Authorization**



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STANDARD OF CONDUCT: PROTECTION OF CONFIDENTIAL INFORMATION OTHER THAN PHI

OUR COMMITMENT

We are committed to maintaining and protecting the confidentiality of proprietary and private information regarding our workforce members and operations.

YOUR RESPONSIBILITIES

- » To protect confidential Harris Health information by only sharing that confidential information with persons who have a legitimate and lawful need to know.
- » To secure confidential information both physically and electronically.
- » To not alter or falsify information on any record or document.
- » To not knowingly communicate or transfer confidential information or documents to unauthorized persons and to take steps to mitigate against unknowingly transferring confidential information or documents to unauthorized persons.
- » To immediately notify your supervisor or the Office of Corporate Compliance if you believe that confidential information has been compromised, lost, or stolen.

EXAMPLES OF CONFIDENTIAL INFORMATION

- » Workforce members' Social Security numbers
- » Workforce members' personal telephone numbers, addresses, email addresses, etc.
- » Financial information, such as credit card information, debit card information, bank account information, etc.
- » Driver's license numbers and license plate numbers
- » Certain vendor information such as bid information
- » Proprietary information such as proprietary computer software

POLICIES TO KNOW

- ➔ **Harris Health Policy 8.03, Records Retention and Destruction**
- ➔ **Harris Health Policy 8.03a, Record Retention Schedule**
- ➔ **Harris Health Policy 6.37, Acceptable Use of HCHD Internet and Email System**





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STANDARD OF CONDUCT: PROTECTION OF HARRIS HEALTH PROPERTY AND ASSETS

OUR COMMITMENT

We are committed to protecting Harris Health's property and information against loss, theft, destruction and/or misuse.

YOUR RESPONSIBILITIES

- » To correctly use and care for all property and equipment entrusted to you whether you are using the equipment and property at a Harris Health facility or in your remote worksite while telecommuting.
- » To maintain, inventory and keep all supplies secure and to not make unauthorized copies of computer software or use personal software on Harris Health computers or equipment.
- » To use Harris Health computers, the email system, the internet, the Harris Health intranet and other technology primarily for work-related purposes.
- » To protect the confidentiality of your passwords.
- » To protect against malicious programs being transmitted into Harris Health's electronic information systems by not downloading unapproved software, files, programs, and/or applications and by not opening files attached to emails from unknown, suspicious or untrustworthy sources and immediately reporting any suspected phishing attempt to Harris Health's Information Security department by email at Infosec@harrishealth.org.

POLICIES TO KNOW

- ➔ **Harris Health Policy 3.11.803, Information System User Responsibility**
- ➔ **Harris Health Policy 3.11.809, Information Systems Password**
- ➔ **Harris Health Policy 6.37, Acceptable Use of HCHD Internet and Email System**

FAQs



My department has several old calculators that are going to be replaced with a newer model of calculator. My child needs a calculator for his math class this year. Is it okay for me to take my old calculator home and give it to my child to use for his schoolwork?

No. It is never okay to take old Harris Health property for personal use. Taking Harris Health property for personal use constitutes theft.

I received an email from Harris Health's Information Technology department asking me for my login user name and password so that the department can install updates to my workstation. Can I give the Information Technology department my login credentials?

No. Harris Health will never ask you for your login credentials or need your login credentials. If you receive an email asking for your user name and password, please immediately forward it to Harris Health's Information Security department at infosec@harrishealth.org for investigation.



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STANDARD OF CONDUCT: PROTECTION OF HARRIS HEALTH NETWORK AND ELECTRONIC DATA

OUR COMMITMENT

We are committed to protecting and safeguarding Harris Health's electronic data, credit card data, and network from unauthorized access and/or use and other malicious activity, such as phishing.

YOUR RESPONSIBILITIES

- » To never share your password or credentials with anyone for any reason. This includes sharing passwords or credentials with Harris Health's Information Security Information Technology departments.
- » To be vigilant in detecting possible phishing attempts and other cyber threats. This includes not clicking on links from unknown sources or senders.
- » To ensure that sensitive information sent outside the organization is done using proper encryption methods.
- » To ensure that any new products, software, or applications have been properly assessed by Harris Health's Information Security for potential risks prior to purchase and installation on Harris Health's network.
- » To report any suspicious cyber activity to Harris Health's Information Security department immediately. This includes an unsolicited telephone call or email request asking for your password and/or username from anyone, including a Harris Health workforce member. You can report suspicious activity by email to the Information Security department at infosec@harrishealth.org.

FAQs



What are the types of electronic data that Harris Health must protect?

Electronic patient health information (ePHI) and electronic workforce member information, such as information stored in Peoplesoft and credit card data.

I am really excited about a new software product that will help me do my job better, and it is very affordable. Can I purchase it and download it to the Harris Health network?

Yes, BUT **you must first have a risk assessment** completed by Harris Health's Information Security department.

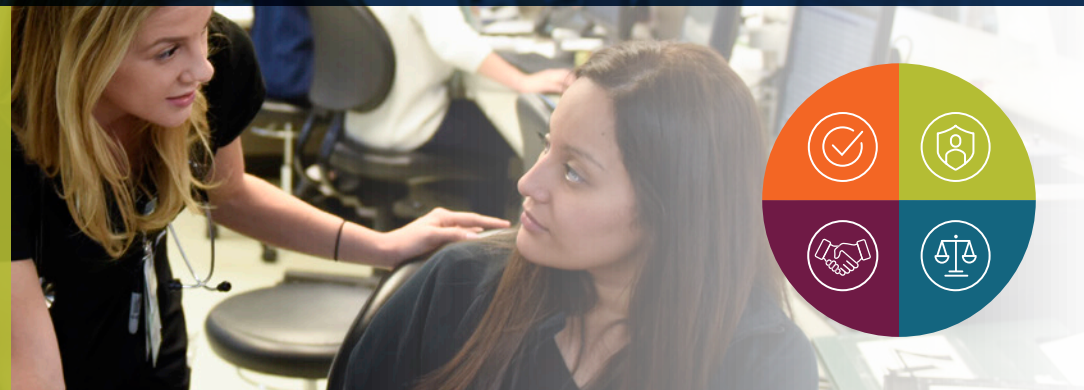
POLICIES TO KNOW

- ➡ Harris Health Policy 3.11.803, Information System User Responsibility
- ➡ Harris Health Policy 3.11.804, Information Security Risk Assessment
- ➡ Harris Health Policy 3.11.809, Information Systems Password
- ➡ Harris Health Policy 6.37, Acceptable Use of HCHD Internet and Email System
- ➡ Harris Health Policy 3.11.902, Payment Card Industry Cardholder Data



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STANDARD OF CONDUCT: HEALTH AND SAFETY

OUR COMMITMENT

We are committed to promoting an environment that is safe, healthy and secure for our workforce members, patients and visitors by following all safety procedures and guidelines.

YOUR RESPONSIBILITIES

- » To strictly adhere to Harris Health's Red Rules and to "stop the line" when noncompliance is observed with a Red Rule as outlined in **Harris Health Policy 3466.01**.
- » To take all reasonable precautions and follow all applicable environmental, health, and safety requirements and rules.
- » To wear Personal Protective Equipment (PPE) whenever it is required.
- » To ensure that you are properly trained to use the equipment you are required to use and that you are properly trained to perform any procedure you are required to perform.
- » To promptly report any and all spills or accidents involving medical waste or hazardous materials, and to report any and all injuries to a workforce member, patient, or visitor. To immediately report any physical assault, threat, intimidation, property damage or knowledge of an unauthorized weapon to prevent workplace violence.
- » To wear your Harris Health ID badge at all times and in the proper location.
- » To never report to work while being impaired by medication (even prescribed medication) or alcohol.
- » To follow Harris Health infection control policies and practices, including but not limited to, wearing a mask when appropriate and required and social distancing.

FAQs



I noticed an improper disposal of some medical waste. Because I am very busy at work, is it okay to wait until later to report what I saw to my supervisor?

No. Safety is a top priority at Harris Health and a hazard such as the improper disposal of medical waste cannot be ignored. This hazard should be immediately reported the moment it is witnessed.

I have a concealed handgun license. Is it okay for me to bring my gun into my office as long as I keep it in my purse?

No. Workforce members are prohibited from possessing weapons on Harris Health premises, even if you have a license to carry the weapon. Please see **Harris Health Policy 3.66, Weapons** for more information.

POLICIES TO KNOW

- ➔ **Harris Health Policy 7100, Emergency Codes Conditions and Responses**
- ➔ **Harris Health Policy 3000, Standard and Transmission Based Precautions**
- ➔ **Harris Health Policy 3003, Personal Protective Equipment**
- ➔ **Harris Health Policy 6.27, Workplace Violence**
- ➔ **Harris Health Policy 4201, Management of Disruptive Patients and Visitors**
- ➔ **Harris Health Policy 3.66, Weapons**
- ➔ **Harris Health Policy 3025, Drug Free Workplace**



INTEGRITY

High standards of business and professional ethics and honesty



STANDARD OF CONDUCT: CONFLICTS OF INTEREST

OUR COMMITMENT

We are committed to acting in good faith in all aspects of our work and avoiding conflicts of interest that could result in undue outside influence or a desire for personal gain.

INFORMATION TO KNOW

- » Harris Health defines a conflict of interest as any situation in which a workforce member has direct or indirect interests, including financial and personal interests or business transactions or professional activities, that may compromise or appear to compromise: (1) the workforce member's business judgment; (2) the delivery of patient care; or (3) the workforce member's ability to do his or her job. In sum, a conflict of interest occurs when your non-Harris Health duties and/or responsibilities compromise or even appear to compromise your duties and/or responsibilities to Harris Health.
- » A conflict of interest could result from the following: (1) outside employment; (2) personal relationships; or (3) business opportunities.





INTEGRITY

High standards of business and professional ethics and honesty



STANDARD OF CONDUCT: CONFLICTS OF INTEREST

YOUR RESPONSIBILITIES

- » To not offer, accept, or provide gifts or favors, such as meals, transportation or entertainment that might be viewed as a conflict of interest and that could violate Harris Health's Gifts policy.
- » To avoid situations resulting in improper personal gain or advantage such as hiring and supervising a family member or awarding a bid to a friend's business.
- » To keep relationships with actual and potential vendors and contractors professional.
- » To not allow outside employment to conflict with your position and employment with Harris Health.
- » To not use Harris Health-owned vehicles, equipment, materials or other property for personal gain, convenience or financial benefit.
- » To report any actual or perceived conflict of interest to the Office of Corporate Compliance.

POLICIES TO KNOW

- **Harris Health Policy 3.42, Conflicts of Interest**
- Harris Health Conflict of Interest Disclosure Form

FAQs



I would like to do some part-time work on the weekends to supplement my paycheck at Harris Health. The job has nothing to do with healthcare and would never interfere with my work schedule at Harris Health. Would this be a conflict?

This would probably not create a conflict of interest because it does not involve healthcare and because it would not interfere with your work schedule at Harris Health. However, before you accept the job, you should discuss it with your supervisor, and you **must** disclose it to the Office of Corporate Compliance to make sure it does not create a conflict of interest.

I am a nurse and my best friend owns a company that provides home health services. Is it okay if I tell my Harris Health patients about his company and his services while I am treating my patients?

No, promoting your friend's company would create a conflict of interest. The promotion of your friend's company would compromise (or at least appear to compromise) your business judgment and the delivery of patient care to your patients because you could promote your friend's company over a better or more qualified company to the benefit of your friend and to the detriment of the patient.



INTEGRITY

High standards of business and professional ethics and honesty



STANDARD OF CONDUCT: GIFTS

OUR COMMITMENT

We are committed to not unduly influencing or being unduly influenced by giving or receiving gifts.

INFORMATION TO KNOW

A gift is **anything of value** that may include but is not limited to monetary gifts, such as cash, checks, gift cards, securities, subsidies, or honoraria, or non-monetary gifts, such as meals, real property, personal property, goods, favors, memberships, or tickets.

YOUR RESPONSIBILITIES

- » To never solicit a gift from a patient, vendor or fellow workforce member.
- » To accept only the following types of gifts from patients: (1) perishable gifts, such as food and flowers that are shared with your department or unit; or (2) handmade gifts such as a knitted scarf or headband. You may only give patients gifts that have been approved by the Office of Corporate Compliance.
- » To only give and accept gifts from workforce members that do not compromise or appear to compromise your business judgment, the delivery of patient care or the performance of your job duties.
- » To never accept cash or cash equivalent items from vendors. Workforce members may only accept a gift, including a meal, if it is valued at less than \$50 from a vendor, and workforce members may not accept more than \$250 worth of total gifts, including meals, from a vendor each year. Workforce members may not accept a gift from a vendor even if the gift is valued at less than \$50 if that gift compromises or appears to compromise the workforce member's judgment, the delivery of patient care or the performance of his or her job.
- » Obtain prior approval from Harris Health's Office of Corporate Compliance before organizing or engaging in a Harris Health campaign to provide gifts to patients and/or their families.

POLICIES TO KNOW

➡ **Harris Health Policy, 3.61 Gifts**

FAQs



I RECEIVED: a gift card from a vendor for \$20

No. You are prohibited from accepting cash or cash equivalents from a vendor.

I RECEIVED: a free lunch from a vendor

Yes. You may accept a lunch from a vendor so long as the lunch is valued at less than \$50 and so long as it does not compromise or appear to compromise your judgment, patient care, or the performance of your job.

I RECEIVED: a tin of popcorn from a patient during the holidays

Yes, you may accept the popcorn as long as you share the popcorn with everyone in your department.

I RECEIVED: an offer to pay for travel and training expenses from a vendor in exchange for speaking at a conference

Maybe. If the vendor is already doing business with Harris Health and has necessary training or product upgrades to show you, then you must first obtain the approval of your Executive Vice President before accepting the vendor's travel proposal. Your Executive Vice President must consult with the Office of Corporate Compliance before approving the acceptance of this gift. If you are being asked to speak for payment at a location other than Houston and travel is involved, discuss the matter with the Office of Corporate Compliance.

I RECEIVED: free tickets to a Houston Texans game from a vendor

No. Workforce members are prohibited from accepting tickets of any kind from a vendor.

I RECEIVED: a picture frame from a co-worker on my birthday

Yes. Workforce members may accept modest gifts from other workforce members so long as the gift does not compromise or appear to compromise the workforce member's judgment, the delivery of patient care or the performance of his or her job duties.



INTEGRITY

High standards of business and professional ethics and honesty



STANDARD OF CONDUCT: COMPLIANCE WITH LAWS

OUR COMMITMENT

We are committed to high standards of business and professional ethics and integrity. We will provide patient care and conduct business while following all applicable federal, state and local laws and regulations.

YOUR RESPONSIBILITIES

- » To promptly report to your supervisors or to the Office of Corporate Compliance any actual or suspected violation of a law, a regulation or a Harris Health policy.
- » To bill payors and patients in accordance with the Federal False Claims Act and the Texas Medicaid Fraud Prevention Act.
- » To never offer, provide, solicit or receive kickbacks, bribes, rebates or anything else of value in order to influence the referral of patients or services payable by a government healthcare program in violation of the Anti-Kickback Statute. For more information, please see **Harris Health Policy 3.31, Preventing and Reporting Fraud, Abuse, and Wrongdoing**.
- » To neither hire nor contract with individuals who have been sanctioned by the Office of the Inspector General of the U.S. Department of Health and Human Services (OIG) or barred from participating in federal and/or state procurement programs.
- » To accept patients based on the patient's clinical needs and our capacity to render those services and to always comply with the requirements of the Emergency Medical Treatment and Active Labor Act (EMTALA) when individuals seek emergency treatment by ensuring that all patients who present to a Harris Health emergency center receive a medical screening exam and have his or her emergency medical condition (if one exists) stabilized or coordinating the transfer of the patient.
- » To ensure and validate that all workforce members who provide patient care are properly licensed and trained.

FAQs



My director and administrative director have told me and my coworkers that we should not contact the Office of Corporate Compliance when we discover non-compliant behavior or inappropriate practices. Instead, we were told that we should contact one of them and only them. Is this okay?

Absolutely not. While it certainly is okay for you to discuss non-compliant behavior or inappropriate practices with your supervisors, you should also always report that behavior to the Office of Corporate Compliance, unless your supervisor is reporting the issue himself or herself.

If a patient is seeking treatment in a Harris Health emergency center but is being disruptive, may Harris Health ask the patient to leave the premises?

Harris Health may ask a disruptive patient to leave an Emergency Center **only after** the patient has had a medical screening exam completed by a QMP and it has been determined that the patient does not have an emergency medical condition. In almost all cases, it is never appropriate to ask a patient to leave an emergency center prior to receiving a medical screening exam.

POLICIES TO KNOW

- ➡ **Harris Health Policy 3.31 Preventing Fraud, Abuse, and Wrongdoing**
- ➡ **Harris Health Policy 3.58, Non-Retaliation for Reporting Fraud, Abuse, and Wrongdoing**
- ➡ **Harris Health Policy 3.56, EMTALA Screening, Stabilization, and Transfer**
- ➡ **Harris Health Policy 3.35, Sanction Screening for Ineligible Persons**



RESPECT

Recognizing the value of all individuals, treating all individuals with kindness, and enhancing the patient, staff and provider experience by actively listening to feedback and developing a culture of respect, recognition and trust.



STANDARD OF CONDUCT: PROTECTING PATIENTS' RIGHTS

OUR COMMITMENT

Harris Health is committed to respecting the dignity and rights of all our patients.

YOUR RESPONSIBILITIES

- » To acknowledge and adhere to Harris Health's Patient Rights and Responsibilities.
- » To listen attentively to patients and their family members and to respond to all questions, concerns and needs in a timely and compassionate manner.
- » To provide the same level of care and service to all patients regardless of race, color, national origin, disability, sex, age or other legally protected status.
- » To share important information about a patient's care in a patient's or a patient's family members' preferred language, and in a clear, professional, and understandable manner.
- » To respect patient decisions regarding his or her care, including the consent for treatment or the decision to change or withdraw treatment.
- » To use restraints in accordance with the law and always remove restraints at the earliest possible time. For further guidance on the use of restraints, please see **Harris Health Policy and Procedure 7.02, Restraints and Seclusion**.

POLICIES TO KNOW

- ➡ **Harris Health's Patient Rights & Responsibilities**
- ➡ **Harris Health Policy 3.52, Non-Discrimination in Access to Services, Programs, and Facilities**
- ➡ **Harris Health Policy 4215, Consent for Medical Treatment and Identification of a Surrogate Decision-Maker**
- ➡ **Harris Health Policy 4128, Advance Directives**

FAQs



A patient who does not speak English requests that her 13-year old daughter interpret for her while the patient's physician explains the patient's diagnosis. Can the daughter interpret for the patient?

No. Harris Health Policy 3.52 provides that you should never rely on a minor child or another family member to interpret on behalf of a patient, **except in emergency circumstances when a qualified interpreter is not available**. However, Harris Health does permit family members to be present to assist the patient in understanding information communicated to the patient through a qualified interpreter.

I speak fluent Spanish but I have not been qualified as a bilingual workforce member. Is it okay for me to speak to my patients in Spanish or to interpret for my coworkers?

No. Only workforce members who have been qualified as a bilingual workforce member may speak directly to his or her patients in a language other than English. Further, only qualified Harris Health interpreters may interpret for a patient who does not speak English. Qualified bilingual workforce members **may not interpret**.

- ➡ **Harris Health Policy 7.02, Restraints and Seclusion**
- ➡ **Harris Health Policy 7.07.02, Inpatient Do-Not-Resuscitate Orders**
- ➡ **Harris Health Policy 7.07, End of Life Care Decision**
- ➡ **Harris Health Policy 4605, Patient Visitor Policy**



RESPECT

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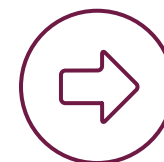
STANDARD OF CONDUCT: HUMAN RESOURCES

OUR COMMITMENT

Harris Health is committed to maintaining a just and accountable culture and creating a workplace where workforce members are treated with respect and fairness and where workforce members' unique contributions are appreciated. Harris Health will strive to create an environment where workforce members are empowered to do their job and provide the best care possible to our patients.

YOUR RESPONSIBILITIES

- » To treat your fellow workforce members with fairness, consistency, dignity and respect regardless of the workforce member's status or position and to foster confidence and professionalism in your fellow workforce members.
- » To promote a work environment that is free from harassment of any kind and to report any intimidating or disruptive behavior you experience or witness. To maintain open lines of communication so that the views of each workforce member may be considered, and their opinions given proper respect.
- » To not engage in disruptive behavior in violation of and defined in Harris Health **Harris Health Policy 6.39, Conflict Resolution in the Workplace.**
- » To use social media responsibly, professionally, and in a manner that complies with **Harris Health Policy 3.50, Social Media.**





RESPECT

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STANDARD OF CONDUCT: HUMAN RESOURCES

HARRIS HEALTH'S RESPONSIBILITIES

- » To provide a just and accountable culture by using a consistent, fair and systematic approach to managing behaviors. Harris Health will facilitate a culture that balances a non-punitive learning environment with the equally important need to hold persons accountable for their actions, including in accordance with **Harris Health Policy 3466.01, Red Rules**.
- » To provide equal employment opportunities and ensure that Harris Health workforce members are hired, trained, promoted and compensated based on personal competence and potential for advancement, and to review and evaluate each workforce member's performance periodically in an objective, consistent and uniform manner.
- » To make employment decisions without regard to a workforce member's race, color, sex, national origin, age, religion, marital status, disability, ethnicity, familial status, military status, sexual orientation, genetic information, gender identity, or pregnancy as well as any other classifications as required by law. Further, Harris Health will take steps to promote and embrace diversity, equity and inclusion in all of its activities. The mission, vision and goals of Harris Health's Diversity, Equity and Inclusion Program are:
 - » **Mission:** To foster an inclusive environment that supports and nurtures the talents, skills and abilities of each individual; encourages curiosity and empathy; and ensures world-class delivery of care marked by equity and respect.
 - » **Vision:** To celebrate the uniqueness of all individuals through acceptance, inclusion, continued learning and respect. The diversity, equity and inclusion initiatives will honor the contributions of every employee, patient and community member to our shared success.
 - » **Goal:** To foster a culture of compassion, trust, integrity, equity and respect that continues to ensure that our patients, staff and partners feel welcomed, understood and valued at Harris Health, and to leverage industry-leading technology and analytics to ensure measurable progress in this goal.
- » To promptly and thoroughly investigate all claims of harassment of any kind, or any other behavior that creates a hostile work environment for Harris Health workforce members.
- » To comply with all applicable federal and state laws regulating the payment of wages.

FAQs

My supervisor frequently makes comments about the way I dress. He says he likes the way I dress because my clothes show off my body and that I have a good body. This makes me feel uncomfortable. Is this sexual harassment?

Comments of a sexual nature **can be** considered sexual harassment. Workforce members can either (1) discuss the unwanted or unwelcomed remarks with the individual involved, if they feel comfortable; (2) contact Human Resources; or (3) contact the Office of Corporate Compliance.

I received my performance evaluation score and I do not agree with it. Is there anything I can do?

Yes, if you are an eligible Harris Health workforce member, you are permitted to grieve your performance evaluation score pursuant to **Harris Health Policy 6.08**. For more information regarding who qualifies as an eligible workforce member, see **Harris Health Policy 6.08**.



POLICIES TO KNOW

- ➔ **Harris Health Policy 6.08, Grievance Procedure**
- ➔ **Harris Health Policy 6.19, Non-Discrimination**
- ➔ **Harris Health Policy 6.36, Sexual Harassment**
- ➔ **Harris Health Policy 6.39, Conflict Resolution in the Workplace**
- ➔ **Harris Health Policy 6.44, Reasonable Accommodation**
- ➔ **Harris Health Policy 6.27, Workplace Violence**

ADDITIONAL INFORMATION:

- ➔ **The Recruit**
- ➔ **Information on Harris Health's Diversity, Equity, and Inclusion Program**



ACCOUNTABILITY

Taking responsibility for the patients we serve and the services we provide in becoming a high-reliability organization with zero patient harm and acting as one system in our approach and management to health care.



STANDARD OF CONDUCT: QUALITY CARE AND ZERO HARM

OUR COMMITMENT

Harris Health is committed to being a high-reliability organization with quality and patient safety being a core value and where zero patient harm is the expectation by providing quality care and services to the patients we serve. To that end, Harris Health will continually monitor the delivery of care and related services to assure that appropriate standards of practice are met and to ensure that it employs appropriately licensed and credentialed healthcare providers to care for our patients.

YOUR RESPONSIBILITIES

- » To take responsibility for the patients you treat and provide care and services that are based on current standards of practice and the most current knowledge.
- » To follow quality improvement protocols and participate in performance improvement and patient safety activities.
- » To actively focus on patient safety and empower coworkers to focus on patient safety and quality of care, including an intense focus on proper patient identification and time-out.
- » To only provide the care that you are licensed or credentialed to provide and that you have been trained to provide.
- » To report any patient safety concerns, patient safety incidents or errors to your immediate supervisor or in Harris Health's electronic incident reporting system (eIRS).

FAQs

I forgot to use two patient identifiers when giving a patient a medication and it resulted in the patient getting another patient's medication instead of their own. The patient brought it back to me before he took any of the medication. Do I need to report this incident even though nothing bad happened as a result of my error?

Yes. Failing to use two patient identifiers to properly identify a patient is an at-risk behavior. An at-risk behavior is defined as a behavioral choice where the risk is not recognized or is mistakenly believed to be justified. Pursuant to **Harris Health Policy 3466, Just and Accountable Culture**, and **Harris Health Policy 3466.01, Red Rules**, all safety events, including near misses such as the one described, must be reported. Failure to report a safety event will result in disciplinary action up to and including termination. Further, employees who commit a Red Rule violation are also potentially subject to disciplinary action under Harris Health's Just and Accountable Culture algorithm.



POLICIES TO KNOW

- ➡ **Harris Health Policy 3466, Just and Accountable Culture**
- ➡ **Harris Health Policy 3466.01, Red Rules**
- ➡ **Harris Health Policy 3.63, Incident Reporting Policy**
- ➡ **Harris Health Policy 7.11, Patient Identification**



ACCOUNTABILITY

Taking responsibility for the patients we serve and the services we provide in becoming a high-reliability organization with zero patient harm and acting as one system in our approach and management to health care.



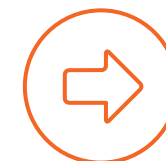
STANDARD OF CONDUCT: BILLING AND CODING

OUR COMMITMENT

Harris Health recognizes that accurate documentation, coding and billing is a critical component to providing quality healthcare and obtaining proper reimbursement. Therefore, Harris Health is committed to timely billing and coding that accurately reflects the services ordered and performed and is in accordance with all federal and state laws and regulations.

INFORMATION TO KNOW

It is a violation of the Federal False Claims Act and the Texas Medicaid Fraud Prevention Act to knowingly submit claims for payment with false or untrue information. Both the federal and state false claims acts include provisions to protect whistleblowers from retaliation for reporting. Harris Health also protects whistleblowers from retaliation for reporting false claims.



POLICIES TO KNOW

- ➡ **Harris Health Policy 3.31, Preventing and Reporting Fraud, Abuse, and Wrongdoing**
- ➡ **Harris Health Policy 3.58, Non-Retaliation for Reporting Fraud, Abuse, and Wrongdoing**



ACCOUNTABILITY

Taking responsibility for the patients we serve and the services we provide in becoming a high-reliability organization with zero patient harm and acting as one system in our approach and management to health care.



STANDARD OF CONDUCT: BILLING AND CODING

YOUR RESPONSIBILITIES

- » To document accurate, timely and complete patient information regarding the services that were provided as part of a patient's care and treatment.
- » To only bill for services or items that are medically necessary and that are documented in a patient's medical record. Harris Health will not knowingly submit for payment or reimbursement a claim that is false, fraudulent or fictitious.
- » To waive co-payments and deductibles in accordance with applicable laws, regulations and Harris Health policies.
- » To respond to all questions and complaints regarding a patient's bill in a timely, direct and honest manner.



FAQs



A co-worker, who has responsibility to review and resolve billing edits, has mentioned that she applies certain modifiers because she knows that if she doesn't, the hospital will not get paid. Should I let someone know?

Yes, you should contact the Office of Corporate Compliance to report this situation. If medical documentation does not support the addition of the modifier, Harris Health may need to repay all payments with the modifier that it had previously received.

Some of my family members are patients at the Harris Health clinic where I work. I would like to give them a "friends and family" discount and not require them to pay any co-pay or deductible and just accept whatever their insurance company will pay. Am I allowed to do this?

No. Medicare regulations expressly prohibit covered entities from waiving copayments or deductibles for any patient unless the patient meets certain indigent requirements.



HARRISHEALTH SYSTEM

The Harris Health System Code of Conduct protects us all. Thank you for doing your part to honor it.

harrishealthcoc.org

