

# Presbyterian Code of Conduct

The Presbyterian Code of Conduct describes the behavior expected of our workforce in providing services to our patients and members. Leaders, employees, independent practitioners, contractors, volunteers, students, vendors and board members are accountable for these core responsibilities. Violations of our Code of Conduct or underlying Federal or State laws, regulations, or Presbyterian policies may result in corrective action up to or including termination of employment, suspension of privileges, or termination of business relationships.

This Code provides guidance, but does not provide every answer in our complex environment. You are expected to ask questions and use good judgement. If you have questions or concerns about a situation, please contact your manager, the Compliance Department or Human Resources.

## A message from our President and CEO



Every day members of the communities we serve come to Presbyterian for their healthcare, either as patients, members or visitors. This is often a very vulnerable time in their lives and they count on us to help them ease the way to their best health.

Presbyterian is committed to providing excellent care and health financing and we know that our patients and members need easily accessible and cost effective healthcare. The community trusts us to do what we say we will do and uphold the standards necessary to meet the ever changing requirements of healthcare.

Our Code of Conduct sets the standards that Presbyterian requires of its workforce in order to “do the right thing” and serves as a guide for interacting with our patients, members, colleagues and communities.

Thank you for all you do for Presbyterian.

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

Dale Maxwell  
President & CEO

# Presbyterian's purpose

Presbyterian exists to improve the health of the patients, members, and communities we serve.

## Values

Our values are the commitments we make to each other as members of the Presbyterian team. We call these our CARES Commitments. In honoring our mission-based legacy, we commit to:

<b>C</b> ollaborate	Bring my best to support individual and team success.
be <b>A</b> ccountable	Keep my commitments and earn trust.
<b>R</b> espect	Honor each other, listen and speak honestly.
<b>E</b> ngage	Participate fully with a passion for excellence.
<b>S</b> erve	Be dedicated to patients, members and each other.

## Our Promise

The Presbyterian Promise is an expression of our commitment to provide an exceptional experience for our patients and members.

### We Promise:

- To know you, respect you, listen to you and treat you with compassion.
- To ease the way to your best health.
- To provide you with the highest quality care at the lowest possible cost.
- To communicate clearly and accurately, coordinate your care and involve you in decisions.
- To do what we say we will do.

## Culture of safety

Presbyterian fosters a culture of safety, through an integrated pattern of individual and organizational behavior based on shared beliefs and values that continuously seek to eliminate patient and member harm that may result from the process of care delivery and plan management. Presbyterian supports safety and quality through teamwork and respect for other people, regardless of their position in the organization. Presbyterian maintains a Just Culture that encourages the routine reporting of errors or concerns, without fear of retaliation or retribution, to enable our organization to improve on processes to better serve our patients, families, plan members and community.

## Uphold ethical standards

- Seek the right course of action in every situation and, when challenged with ethical dilemmas, obtain the advice and counsel of supervisors, managers, or senior leaders.
- Protect and uphold Presbyterian's reputation (brand) and legacy for integrity and community service in all of my personal and professional endeavors.
- Adhere to all laws, regulations and Presbyterian policies and foster an atmosphere that promotes and supports Presbyterian's efforts to ensure compliance with laws and regulations.
- Be familiar with and vigilant to prevent fraud, waste and abuse of the resources entrusted to us by our patients and members.

## Positive behaviors

We promote positive behaviors and work environments. Disruptive and/or harassing behaviors, intimidation or retaliation by individuals working at any level of the organization will not be tolerated; leadership will address such behaviors with all members of the workforce.

## Protecting privacy & confidentiality

Presbyterian is committed to safeguarding the privacy of patient and member information.

Although Presbyterian collects information about our patients and members, we do not access, use, or discuss this information with others unless it is allowed by privacy laws.

## Report concerns and problems

All workforce members have a duty to report to their supervisor, manager, senior leader, the Presbyterian Compliance Department, the Anonymous Compliance and Fraud, Waste and Abuse Hotline (888) 435-4361, or other appropriate department such as Human Resources through AskHR 505-923-8750, the following behaviors:

- **Unethical or prohibited behavior** including actual or suspected unethical behavior, illegal activity or violation of Presbyterian policies and procedures;
- **Disruptive or inappropriate behavior** including disrespectful language, sexual comments, inappropriate touching, anger outbursts, name-calling, racial or ethnic jokes or slurs, intimidation, the deliberate failure to follow policies, address safety concerns or patient care needs, and other behaviors that are disruptive or inappropriate;
- **Action or inaction of caregivers** that may pose a danger to patients or result in substandard care;
- **Any retaliation** for raising or reporting ethical, compliance or other concerns.

Retaliation will not be tolerated, regardless of the status or tenure of the person responsible for the retaliation. Individuals who report concerns in good faith will be protected from retaliation.

The Presbyterian Compliance Department takes these concerns seriously and will follow up and take the appropriate action on all reports. All reports will be treated confidentially as the law allows.

## Respect others

- Treat all patients, members, colleagues, and applicants with respect and dignity regardless of age, race, creed, religion, color, national origin, ancestry, sex, sexual orientation, gender identity, marital status, physical or mental disability, status as a veteran, or ability to pay.
- Honor member and patients' rights to participate in and make decisions about their care, including the right to refuse care when permitted by law.
- Provide patients and members with information about their illness, treatment plan, pain management, treatment alternatives and outcomes in a manner they can understand, and provide interpretation services when needed.
- Identify myself to patients and members by providing my name, my role, and my purpose for the interaction.
- Listen to and document patients' and members' concerns and complaints so they can be addressed.
- Protect confidential customer and organizational information in accordance with privacy and security policies.
- Respect and listen to colleagues perspectives, in order to provide the best care or service possible.

## Abide by the law, professional licensure and privileging

- Abide by all Federal and State laws including those that relate to members, patient referrals and provider relationships.
- PHS is strongly committed to the health, safety and welfare of its PHS workforce members, volunteers, patients, and plan members. Report to work or volunteer free from alcohol, drugs or other controlled substances that affect job performance and/or safety.
- Comply with all Federal and State laws, regulations, and policies related to environmental health and safety, including fire, chemical, biological, ergonomic, radiation, and electrical safety and appropriately handle, transport, and dispose of medical waste and other hazardous materials.
- Provide only those services that are within my licensure or scope of practice and for which I am privileged to perform at Presbyterian.
- Ensure that all licensure and certification required to provide safe patient care are current and renewed timely.
- Ensure charges are submitted only for services or supplies that were provided to the patient or member and accurately represent the level of service provided to the patient or member. Only those services that are medically necessary will be submitted for payment to Medicare, Medicaid and other payers.
- Ensure that all reporting to the government is truthful and accurate and never give false or misleading information to a government employee, agent, or person representing a government agency.
- Ensure that all negotiations and contracting with government entities are conducted in accordance with Federal, State, and local laws and regulations.
- Comply with the Health Insurance Portability & Accountability Act (HIPAA).
- Not employ or contract with ineligible parties in accordance with the Excluded Individuals and Entities policy.

## Maintain financial integrity

- Manage with integrity and prudence Presbyterian's financial and other resources and hold other Presbyterian workforce members accountable for doing the same.
- Refuse to accept or offer gifts or benefits or enter into relationships with individuals, competitors, vendors, suppliers, or contractors (such as pharmaceutical and medical device companies) that may influence or be perceived to influence a decision or action taken on behalf of Presbyterian in accordance with conflict of interest policies.
- Do not violate laws pertaining to fraud, waste or abuse of government funds.
- Support internal and external audits and recommendations and assist with any corrective actions.

## Further, Presbyterian leadership commits to

- Investigate suspected legal and ethical violations in accordance with the Compliance Reporting and Investigation policy and take corrective action when violations occur in accordance with corrective action policies.
- Foster a culture of compliance, safety, and quality and when problems are identified, implement changes as appropriate.
- Act with unquestionable integrity.
- Provide opportunities for workforce members to participate in compliance, safety, and quality initiatives.
- Manage disruptive and inappropriate behaviors in accordance with Presbyterian policies.
- Provide education that focuses on compliance, safety, and quality.
- Provide patients and members the means to report their concerns about compliance, safety, and quality.
- Uphold Presbyterian's ethical work environment and never exempt any employee from State or Federal laws.
- Create an environment free of harassment and discrimination, supporting diversity and inclusion.

## Workforce commitment

*As a member of the Presbyterian team, I acknowledge that I have read the Code of Conduct. I agree to support the values of Presbyterian and the Culture of Safety and to abide by the standards above. I understand that I will be held accountable if I fail to do so. I also understand that compliance with regulatory requirements is everyone's responsibility.*

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Signature

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Date