



Fred Hutch · Seattle Children's · UW Medicine

Integrity at Work: Statement of Ethics and Business Conduct

Introduction

This is your copy of the Seattle Cancer Care Alliance (SCCA) Integrity at Work Handbook. This handbook, developed with input from our staff and senior management, outlines our principles, standards of conduct, and Integrity Program. It serves as a reference point for compliance and ethics standards and outlines processes for you to follow if you should ever have any questions or concerns.

Please take the time to carefully read and periodically review the material in this handbook. It is the responsibility of every person who works at SCCA to read and understand its contents in order to know what is expected in the work environment. Your knowledge of this material will help keep SCCA in full compliance with all applicable laws, regulations, and policies governing our business practices. It will also help us meet expectations of the Office of Inspector General, Department of Justice and other agencies, as well as SCCA's board of directors and administration, that SCCA develop and maintain a compliance program to appropriately guide business practices and the delivery of services.

Everyone associated with SCCA is responsible for acting in a manner consistent with our corporate integrity program and its supporting policies, as well as all applicable federal and state laws and regulations. Thus, it is your responsibility to comply with the standards contained in this handbook, to report any concerns or violations to your supervisor or the Integrity Officer, and to assist with any investigation involving allegations of violations or other wrongdoing.

The SCCA is committed to a culture of integrity. We know that we can count on you to exhibit this culture in your daily work and activities. Thank you for your continued support of the SCCA's mission and dedication to excellence.

Sincerely,

A handwritten signature in black ink that reads "Fred Appelbaum".

Fred Appelbaum, M.D.
Executive Director & President

A handwritten signature in black ink that reads "Phuong L. Dao".

Phuong L. Dao
Corporate Integrity Officer

Our Mission Statement

The general mission of the Seattle Cancer Care Alliance (SCCA) is to provide excellent clinical services that support the patient care, clinical research, and teaching endeavors of the Fred Hutchinson Cancer Research Center, UW Medicine, and Children's Hospital and Regional Medical Center, as well as to assure that cancer patients in the Northwestern United States have rapid access to the best cancer treatment available. Our focus is on enhancing the current clinical support for cancer research and teaching of the three Members, improving the transfer of new diagnostic and treatment techniques from clinical research settings to community-based providers, and delivering cost effective patient care services.

Principles Governing Our Practice

- Caring and supportive environment for patients and families
- Orientation towards research and education
- Integrated service across sites of care
- Multidisciplinary team effort
- Wise stewardship of resources
- Commitment to continuous learning and improvement

Principles Governing How We Work Together

- Commitment to excellence and accountability
- Mutual respect and appreciation
- Focus on outcomes
- Collaboration across the care delivery system

Our Commitment

The SCCA is committed to a culture of integrity and has established an Integrity Program to assist in these efforts. The healthcare industry is a highly regulated environment functioning within thousands of pages of laws, rules, and guidelines that are constantly subject to interpretation. In this complex environment, mistakes can occur. It is our intent to comply with all laws and regulations and promote a culture of integrity where everyone is encouraged to do the right thing.

In order to protect the best interests of the organization, our staff and our patients, we are committed to the following standards:

- Protect the health and safety of all patients and staff
- Provide fair and equitable treatment for all staff members
- Promote a positive and harassment free work environment
- Keep accurate and complete books and records
- Maintain an effective system of internal controls over financial reporting
- Safeguard confidential, proprietary and personal information
- Avoid conflicts of interest
- Prevent and detect fraudulent activity and immediately report it to the appropriate federal or state agency

Corporate Integrity Program

Overview

The Integrity Program is a system that promotes compliance with applicable federal and state laws and regulations, develops individual and team character and virtue in the workplace, and creates and maintains a culture of integrity. The Integrity Program is led by an Integrity Officer and overseen by an Integrity Committee.

This Statement of Ethics and Business Conduct provides guidance to all staff working at the SCCA (staff includes all employees, medical staff, affiliates etc.) and assists us in carrying out our daily activities within appropriate legal and ethical standards. It is a critical component of our Integrity Program. We have developed this document to ensure we meet our ethical standards and comply with applicable laws and regulations. These obligations apply to our relationships with patients, affiliated physicians, third-party payers, subcontractors, independent contractors, vendors, consultants and one another.

The SCCA also has developed policies and procedures that govern business activity. Under the Integrity Program, the SCCA will develop new policies and procedures to respond to new laws and regulations as needed.

The SCCA performs periodic auditing and monitoring activities in order to ensure that the organization is compliant with all applicable laws and regulations. When the SCCA identifies areas that need improvement, corrective actions will be implemented. The results of these audits will be shared with the Integrity Committee.

Communication & Training

You will receive an introduction to the Integrity Program through orientation and through reading this handbook. All staff members will receive ongoing training on topics such as fraud awareness, coding and billing regulations, confidentiality laws, human protections awareness, etc. Other communications regarding Integrity Program activities and pertinent policies and procedures will be distributed through the employee newsletter, at staff meetings, all staff emails, and through other mechanisms as needed.

Reporting Your Concerns

What do I need to report?

Compliance issues can be complex and knowing when to report a potential issue is not always easy. Here are some questions that you can ask yourself when presented with a possible violation:

- Does the situation put a staff member or patient at risk or harm?
- Does the action seem illegal?
- Is it inconsistent with SCCA policies and procedures or this Statement of Ethics and Business Conduct?
- Does it violate your standard of ethical behavior?
- Would failing to act make the situation worse or allow a “wrong” to continue?

Why do I need to report?

It is the responsibility of every staff member to abide by applicable laws and regulations and to support SCCA’s compliance efforts. All staff are required to promptly report any potential violations.

Will I get in trouble for reporting a violation?

No. The SCCA has a Non-Retaliation Policy that ensures no one will be subject to any adverse action because they report what they in good faith believe is a Compliance violation. However, if SCCA determines that someone purposely made up, exaggerated, or otherwise distorted a report of wrongdoing, whether to protect themselves or to hurt someone else, that person will not be protected under this policy. Refer to the Administration APOP: Non-Retaliation for more information.

How do I report an issue?

There are several alternatives for reporting an issue:

- Discuss the issue with your supervisor, manager or director
- Report the issue directly to the Integrity Officer at (206) 288-6380
- Call the Integrity hotline (206) 624-1159

What is the Integrity Hotline?

The hotline is a voicemail system that can be used to report issues or concerns anonymously. Calls to the Integrity hotline will not be traced. Callers do not have to identify themselves; however they may do so in order to be of assistance in giving further information about the situation. The Integrity Officer retrieves this information and will conduct an investigation based on the information provided.

What happens after I report a violation?

The Integrity Officer will investigate all reported concerns promptly and confidentially to the fullest extent possible and initiate corrective actions as appropriate. The Integrity Officer will follow-up with the individual reporting the situation and will provide information to the extent possible.

Disciplinary Process/Corrective Action

The SCCA will not tolerate behavior that is inconsistent with this Statement of Ethics and Business Conduct. Failure to comply with laws, regulations and the SCCA policies and procedures is a serious matter and may lead to disciplinary action, up to and including termination of employment. Sanctions will be applied in accordance with the SCCA Disciplinary Action Policy.

Sanctions for affiliates could include a report of the violation to the home institution and loss of access and/or privileges at the SCCA.

Patient Care Standards

Commitment to Service

We provide a uniform standard of care and service throughout the SCCA based upon the needs of our patients. We provide services that are responsive to the health-care needs of the population served and deliver these services in an acceptable manner.

Culture of Safety: Principles of a Healthcare

Workplace Environment

The key elements of a culture of safety in the healthcare workplace environment are open communication and effective collaboration. It is only through the creation of an open atmosphere that safety can be effectively improved.

The SCCA is committed to creating a healthcare workplace environment which:

- All members of the healthcare environment commit to and accept responsibility for safety
- All members of the healthcare environment feel empowered to hold each other accountable for patient safety and feel free to speak up should it be compromised
- A non-punitive environment is maintained, and is grounded in trust and mutual respect
- Reporting of errors, risks, near misses, and harm is encouraged

Patient Care: Access, Admission, Discharge, Transfers

We provide impartial access to health care, regardless of race, creed, gender, national origin, sexual orientation, physical impairments, or religious preference. We do not place any conditions on provision of care or otherwise discriminate against an individual based on whether he or she has executed an advance directive. We will provide care only to those patients who can be cared for safely within our facility.

If we cannot provide the appropriate care needed, we will arrange for safe efficient transport to another medical facility where such care is available based on the assessed needs of the patient.

We treat all patients with dignity, respect, and courtesy. Qualified individuals must assess the requirements and needs of our patients and identify appropriate services. When appropriate we will seek input from families, medical staff, and referral and payer sources.

SCCA supports efforts to provide effective communication, coordination of the team's activities, and involvement of patients, their families, and community agencies in the process of discharge planning. Patients and their families will be involved in decisions regarding their care to the extent that this is practical and possible. We will inform patients about therapeutic alternatives and the risks associated with the care they are seeking. We will seek to understand and respect their care preferences and objectives.

Patients' Rights & Responsibilities

We inform patients of their rights as an individual receiving care at the SCCA in the "Rights & Responsibilities" brochure and the "Joint Notice of Privacy Practices".

Resolutions of Conflicts

We recognize that conflicts can occur between those who participate in hospital and patient care decisions. Our goal is to resolve all conflicts fairly and objectively as possible. If a resolution can be achieved, it is our policy to involve the appropriate staff and leadership to help in resolving the conflict. One of the ethics resources may also be contacted for advice (see pg. 14).

Integrity of Clinical Decision Making

Clinical decisions are based on identified patient health care needs. The integrity of clinical decision-making is constantly maintained, regardless of how leaders, managers, clinical staff and licensed independent practitioners are compensated and/or share financial risk.

Patients, or their legally authorized representatives, may ask for and be informed of the existence of business relationships among our partners, including educational institutions, other health care providers or payers that may influence a patient's treatment and care.

Key Contacts/Resources:

Patient Relations: (206) 288-1056 (patient advocacy, complaints, comments)

Quality Improvement/Patient Safety: (206) 288-1056 (quality assurance monitoring, performance improvement teams, patient safety initiatives)

Risk Management: (206) 288-1056 (risk identification, prevention, and control)

Guidelines for Business Conduct

Accuracy of Records

We expect all patient and business records to be accurate, complete, and retained for the periods prescribed by law and SCCA policies. Patient and business records must conform to accepted standards for the maintenance of such records and shall not contain false or misleading information. Medical records may be amended to correct an error or complete documentation only in accordance with established medical records procedures. All financial transactions must be recorded in accordance with generally accepted accounting principles and SCCA policies and procedures.

Antitrust Laws

SCCA complies with all antitrust laws. No matter what pressures exist in today's health-care environment, we must never engage in business practices that could be viewed as competing unfairly. It is unlawful to agree, or attempt to agree, with competitors to fix prices, divide geographic or service markets, or make any agreement that artificially raises the price of our services or improperly reduces competition. Special care should be taken when joint ventures or working relationships with other health-care organizations are being considered.

Billing Practices

All billing must comply with the requirements of state, federal, and private payors. SCCA bills only for services actually rendered, and substantiating medical documentation must be provided for all services rendered. If the appropriate documentation has not been provided, it is assumed that the service has not been delivered, and no charge should be submitted or bill generated.

The False Claims Act is a federal law that prohibits knowingly submitting a false claim for reimbursement. It requires knowledge that the claim was false, defined as:

- Actual knowledge that the claim was false
- Deliberate ignorance of the truth or falsity
- Reckless disregard of the truth or falsity
- There is a similar Washington state law (RCW 48.80.030).

Possible penalties under the False Claim Act include \$5,500 to \$11,000 per claim, plus damages up to three times the amount of any overpayment, exclusion from Medicare, a government-enforced Corporate Integrity Program and criminal prosecution.

The False Claims Act, state law (RCW 43.70), and SCCA policy prohibit retaliation against an employee who reports concerns to the government.

Examples of situations that a false claim can include:

- Billing separately for services that should be a single service
- Billing for services not medically necessary or without a documented order
- Billing for a service that was not performed
- Duplicate billing for the same service

Refer to the Integrity Program Description and Integrity Investigation policy for more information.

We have implemented policies, procedures and systems to facilitate accurate billing to government payers, commercial insurance payers, and patients. These policies, procedures and systems conform to pertinent federal and state laws and regulations. We prohibit any staff member or agent of the SCCA from knowingly presenting, or causing to be presented, claims for payment or approval that are false, fictitious or fraudulent.

Confidential and Proprietary Information

We recognize the need to maintain patient, personnel, and sensitive management information in a confidential manner. All staff have an ethical and legal responsibility to respect the privacy of patients. Staff shall not obtain or release information about patients unless it is appropriate and necessary to the performance of their job responsibilities. Both written and electronic patient information will be maintained in a controlled, secure, and confidential manner. Never disclose confidential information to an unauthorized person.

Information obtained, developed, or produced by SCCA and its staff, and information supplied by outside consultants or vendors for the benefit of SCCA, is considered confidential and/or proprietary. This information should not be disclosed to anyone outside SCCA unless you have specific authorization to do so in accordance with federal and state law. Do not disclose this information to other SCCA staff members except on a “need to know” basis.

Always take reasonable steps to prevent copying or unauthorized use of copyrighted, trademarked, or licensed materials and to safeguard proprietary information entrusted to SCCA.

Conflict of Interest

A conflict of interest may occur if your outside activities or personal interests influence or appear to influence your job performance or the decisions you make in the course of your job responsibilities. It is your responsibility to be free from conflicts when performing your duties.

Many situations may give rise to a conflict of interest. The existence of a conflict of interest, however, does not mean that the outside activity or relationship must cease. In many cases, steps may be taken to ensure the conflict does not impact your work on behalf of SCCA. If you have any questions about whether an outside activity or particular situation might give rise to a conflict of interest, before engaging in the activity, you must first discuss it with your supervisor or the Integrity Officer.

Ethics

SCCA is dedicated to the principle that all patients, staff, faculty, volunteers, visitors, and students deserve to be treated with dignity, respect, and courtesy. It is the responsibility of everyone associated with SCCA to act in a manner that is consistent with this Statement of Ethics and Business Conduct and all SCCA policies and procedures.

Resources are available for any questions or concerns:

- Clinical care related ethical concerns - contact the Clinical Ethics Hotline at (206) 667-7239
- Research related ethical concerns - contact the Consortium Ethics Committee at (206) 667-4389 or (206) 667-1221
- Any other ethical concerns - contact the Integrity Officer at (206) 288-6640 or the Integrity Hotline (206) 624-1159

Gifts, Gratuities, and Items of Value

In order to prevent the actual or perceived conflict of interest in accepting gifts, the SCCA has established the Gifts, Gratuities and Items of Value Policy. The Gifts policy applies to all staff working at the SCCA (including employees, medical staff, affiliates etc). Staff members must not accept gifts that exceed \$50. Cash is never to be accepted. Refer to the Compliance APOP: Gifts, Gratuities and Policy for more information.

Government Investigation

SCCA will cooperate with all legally authorized government investigations. If a person who identifies him or herself as a government investigator approaches an SCCA staff member or the staff member receives a subpoena or other written, official governmental request for information, the staff member should contact the Integrity Officer at 206-288-6640 immediately. The Integrity Officer will help verify the credentials of the investigator, determine the legitimacy of the investigation and follow proper procedures for cooperating with the investigation.

SCCA staff must never destroy or alter any company document or record in anticipation of a request for the document or record by a government agency or court. Never lie or make false or misleading statements to any government investigator. Never

attempt to persuade any staff member to provide false or misleading information or to fail to cooperate with a government investigation. Refer to the Response to Government & Related Subpoenas Policy for more information.

Human Research Participant Protections Program (HRPPP)

The SCCA created an HRPPP to ensure that the SCCA is a safe and compliant environment for the conduct of human participant research. This program is a system that protects the rights and welfare of individuals who participate in research. The SCCA has completed a Federal Wide Assurance (FWA) that is our statement of compliance with the Office for Human Research Protections (OHRP) standards.

Key contacts:

- Integrity Officer/Human Protections Administrator (206) 288-6640
- Human Protections & Research Implementation Coordinator (206) 288-1287

Marketing

We are honest, accurate, and appropriate when providing information about or marketing SCCA services. Our objective is to create and increase awareness of these services, stressing their value and our capabilities, always mindful of the trust that the public places in us to provide accurate information. Our patients' (and our potential patients') well being is our priority, and we place their good above all other interests.

Protection of SCCA Assets

We are all responsible for protecting and preserving SCCA property, equipment, and supplies. SCCA property, owned or leased, includes not only office and medical equipment, vehicles, supplies, reports and records, and computer software and data, but also trademarks and service marks, intellectual property, facilities, and services provided by SCCA.

Each of us should also be diligent in protecting and preserving the property of others, including SCCA patients, visitors, health care providers and support staff, students, and volunteers.

Work Environment

The SCCA is committed to providing a safe and healthy workplace, and to the privacy, security and comfort of its staff. We expect our staff to uphold all policies, procedures, laws, regulations, standards, and practices intended to make the treatment and work environment healthy and safe. We follow all federal, state and Equal Employment Opportunity Council laws and regulations for recruiting and retaining qualified staff members. We maintain a harassment free work environment. We keep our workplace drug and alcohol-free.

We follow all laws, regulations and policies related to environmental health and safety. We make sure that medical waste and hazardous materials are handled, transported and disposed of properly. We take reasonable steps to keep our workplace safe and avoid harming ourselves, co-workers, patients or visitors. We report all incidents and accidents according to departmental policies. We attend safety training as required. We understand our responsibilities during disasters, severe weather, and other emergencies. We follow practices that reduce the spread of infection, such as washing hands and wearing personal protective equipment. We store all drugs, pharmaceuticals, chemicals and radioactive materials safely and maintain proper records.

If you observe any practice or condition that you perceive as unsafe, unhealthy or hazardous, promptly report this to your supervisor or an appropriate SCCA authority.

For any questions or concerns about the "Integrity at Work" booklet contact the Integrity Officer at (206) 288-6380.