

# Standards for Business Conduct





Dear MultiCare Team Members,

Our mission is “Partnering for Healing and a Healthy Future.” We exist to meet the needs of our communities and serve our patients and their families. We do this by providing high-quality, safe, compassionate, high-value services and ethical patient care in each and every encounter, visit, admission, call, education session, community event, and more. We fulfill our mission in numerous settings and in collaboration with our many partners, including our vendors, community providers, volunteers, students, employers, insurers and others.

This handbook is intended as a resource providing guidelines and direction on how we will act as we fulfill our mission. Our standards are aligned with our shared values: Respect, Integrity, Stewardship,

Excellence, Collaboration and Kindness. It is expected that all of us who represent MultiCare do so with our mission, vision, and values in mind. As a not-for-profit organization, we must be good stewards of the health of our community, of our organization’s assets (community assets), and of our reputation. We need a solid, trusting relationship within our organization, with our partners and with our community. Our Standards for Business Conduct outline how we work hard, every day, to ensure that everything we do is done with integrity and in a manner consistent with high ethical standards.

We are a human organization and at times we will not live up to our expectations. If and when this happens, the mechanisms for reporting are clearly outlined. We rely on the integrity and honesty of all of us as individuals and as a team – employees, providers, and others – to deliver on our value of integrity.

There are times when people need to access a confidential resource. To help provide this resource, we have a confidential compliance hotline and email (Integrity Line). We encourage those with questions and concerns to ask. We have system experts in Human Potential, Legal, Quality, Compliance, Security and more. Please do not hesitate to ask questions. We work in a complex environment and being willing to ask questions is essential to doing good.

Retaliation must not be a part of our organization’s culture, and you will not be retaliated against for asking questions or raising concerns. Questions are a gift; an opportunity for us to learn. If you have questions about what is proper conduct for you and others, promptly raise that concern to your manager or use one of the other reporting channels described in this handbook.

We are governed by a community Board of Directors. The Board provides oversight and direction for our mission, vision, values, strategies, care, quality, operations, finances, and compliance efforts. We work in a very complex and rapidly changing ecosystem and are subject to many regulatory requirements. We work hard to always comply with the laws, rules, and regulations that are applicable to our organization and seek to educate, to audit, and to report on our efforts.

Thank you for supporting MultiCare’s ethical standards. We appreciate all your efforts.

**William G. “Bill” Robertson**  
CEO  
MultiCare Health System

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# MultiCare

## Mission, Vision, Values

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### **Our Mission:**

Partnering for Healing and a Healthy Future

### **Our Vision:**

MultiCare will be the Pacific Northwest's highest value system of health:

- Leading as a people-centric community asset
- Integrating a full continuum of high-performance, customer-focused health and health related solutions
- Delivering world class health outcomes and exceptional experience at a competitive price

### **Our Values:**

- Respect
- Stewardship
- Collaboration
- Integrity
- Excellence
- Kindness



## MultiCare Has Trust in our Standards

Our Standards for Business Conduct (Standards) are the guide to bringing MultiCare's values to action. When we think about how we will achieve our mission, it requires building trust with people and organizations throughout the Pacific Northwest and more. This trust is built upon ethical behavior and holding true to our values. The Standards will show you how we act and live true to MultiCare's values.

As you read through the Standards, you will see sections called "Tying It Together," along with "What If" scenarios. These are here to guide you through how to apply the Standards to various situations.



### Tying it Together:

HealthCare is one of the most highly regulated industries in the United States, so it is understandable that you may have questions about your compliance responsibilities. The MultiCare Compliance & Ethics Program is your resource to help you interpret the laws and regulations that effect your work and MultiCare's operations. MultiCare expects you to contact one of the resources identified in this publication anytime you suspect someone at MultiCare, or someone who does business with MultiCare, is violating a law or regulation that governs our business, protects the privacy of our patients, or ensures equal access to healthcare.

**Martha Raymond**  
VP, Chief Risk and Compliance Officer

# Making Good Decisions

The Standards are general principles. They explain where to turn in many situations and provide guidance and resources for the most common ethical questions and scenarios that MultiCare faces. By following the Standards, you can know that you are acting with Integrity and following the law. However, the Standards do not include every scenario that you may face.

When faced with an event that the Standards doesn't cover, or when deciding upon a course of action, ask yourself the following questions:

- Does my action reflect MultiCare's values?
- Does my action build trust with my co-workers, community, and/or patients?
- Does my action protect my reputation and MultiCare's reputation?
- Is this good for MultiCare or my patients?
- Would I feel okay if everyone knew about it?

If your answer to all these questions is YES, then you are probably safe to proceed.

If you answered NO to any question or would like confirmation of your decision, please seek guidance from your leadership; the Compliance, Privacy & Civil Rights office, or Human Potential before moving forward.



## What If?

**Q:** Who can I go to if I have a concern?

**A:** You can bring concerns to any of the following:

- Your immediate supervisor or higher level manager;
- Anyone in Compliance, Privacy & Civil Rights;
- Human Potential, Quality Management or other appropriate department; or
- The Integrity Line at 866-264-6121.



## Tying it Together:

Remember that it is up to everyone to ensure that MultiCare achieves our Vision. One of the best ways to do this, is by building trust with each interaction. At MultiCare, we build trust by using AIDET. AIDET can be used when providing care, leading a meeting, greeting a visitor in the hallway and in many other scenarios.

**A = Acknowledge**

**I = Introduce**

**D = Duration**

**E = Explanation**

**T = Thanks**

# Everyone is Responsible for Following Our Standards

## Knowledge and Compliance

Many policies and legal requirements exist that apply to specific matters. Some of these will be referenced throughout the Standards. It is your responsibility to know and follow the laws, policies and procedures that apply to your role at MultiCare.

It is also important that everyone completes the training required for their role. Annual Mandatory Education, New Employee Orientation, unit-based education and continuing education are critical to ensuring that you have the information needed to do the right thing.

### MULTICARE POLICIES

 [MHS Policy Page](#)

### POINT MULTICARE

 [Point MultiCare Homepage](#)

## Speaking Up

The Standards and our policies cannot replace your own sense of integrity and good judgement. If something makes you uncomfortable or doesn't feel right, it is your responsibility to say something. Never engage in or ask others to engage in unethical behavior. Immediately report any request for you to do something you think may be unsafe, illegal, or unethical.



## Tying it Together:

### Compliance, Privacy & Civil Rights Point MultiCare intranet sites:

These intranet sites provide MultiCare team members with information that is easy to access and understand. In addition to Integrity Line information, there are internal links including compliance, civil rights, and privacy guidance, resources and tools. The materials demonstrate alignment with MultiCare values and guide team members to "Do the Right Thing" which improves overall trust and compliance, reduces risk and drives beneficial culture change. These sites highlight reporting and team contact information, news & events, and an easy to follow path to Corporate Compliance and the Privacy & Civil Rights Office.

# Reporting Integrity Concerns

One of the most important responsibilities we share is speaking up and reporting issues. Everyone at MultiCare has an obligation to report concerns related to unethical or illegal behavior as a condition of employment.

You don't have to have all the details or prove that something is wrong to raise a concern. Raising a concern should be as easy as possible, so there are a variety of ways to report when something is wrong. If you aren't comfortable sharing your name, the Integrity Line offers a means to report anonymously. The Compliance & Privacy Point MultiCare intranet site has up-to-date information on reporting. Choose the option that you are most comfortable using.

Reports can be made through

- Your leadership;
- The Integrity Line phone number: 1-866-264-6121;
- The Integrity Line portal
  - Submit an Inquiry
  - Report a Concern;
- The Integrity Line email: [compliance@multicare.org](mailto:compliance@multicare.org); or
- Anyone in the Compliance, Privacy & Civil Rights office.



## Tying it Together:

### The Integrity Line

The Integrity Line (1-866-264-6121) is available 24 hours a day, 365 days a year. Both the portal and phone number offer anonymous reporting and status updates. The phone number is managed by an external third party, ensuring a neutral intake process.

The Integrity Line call center representative will walk you through the reporting process and route your questions or concerns to Corporate Compliance or Privacy & Civil Rights. Calls are not traceable and no attempt is made to identify callers who request to remain anonymous. Even if a caller identifies themselves to the representative, if the caller wishes to remain anonymous to MultiCare, the call center will not share their identity.



## What If?

**Q: As a vendor working with MultiCare, how can I make a report?**

**A:** You are welcome to report concerns using any of the methods mentioned to the left. You do not have to be an employee to send us an email or use the anonymous reporting option through the Integrity Line's phone number.

**Q: If I think that another employee is violating a MultiCare policy; who should I contact?**

**A:** Act with integrity and speak up! The success of MultiCare depends on employees taking action if they believe there is wrong-doing. If possible, start with your supervisor and explain the issue. If it cannot be resolved at this level, contact a more senior manager. Continue this process until you get an answer that makes sense to you. If you are uncomfortable discussing the issue with someone at your location, you may call the Integrity Line.

**Q: I recently observed a physician doing something I think may be bad for the patient. I think I should tell someone about this but don't want to be considered a snitch or get in trouble for questioning a doctor. What should I do?**

**A:** You should escalate your concern! As we become a High Reliability Organization, it is critical that everyone speaks up and looks out for patient safety. If you do not feel comfortable speaking with the doctor or your supervisor, you may also report to the patient safety reporting system (HeRO). There are paths in place to find out what is happening and evaluate patient care.





All concerns reported to the Integrity Line are treated as confidential. This means the information provided by the reporter and gathered in the follow-up are shared only on a “need-to-know” basis with those are participating in the investigation or follow-up.

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These are the types of concerns that should be reported through the Integrity Line:

- Theft, fraud, waste, and abuse;
- Conflict of interest concerns or issues;
- Accepting or giving inappropriate gifts and gratuities;
- Falsification of documents;
- Inaccurate or incomplete documentation, coding or billing;
- Privacy concerns or potential breaches;
- Non-compliance with regulatory requirements;
- Disclosing confidential information;
- Reports of patient discrimination.

# Zero Tolerance

We know it takes courage to report concerns. We understand that you may be uncomfortable or anxious. This is why we do not tolerate retaliation or retribution.

You will not suffer adverse consequences for:

- Refusing to do something that violates these Standards
- Raising a concern in good faith
- Cooperating with an investigation

Retaliation or retribution will result in disciplinary action, up to and including termination.

## MULTICARE POLICIES

### Non Retaliation

## Reporting Integrity Concerns

**Q: Why do I report compliance concerns and patient safety concerns to different places?**

**A:** Unlike quality and patient safety events, compliance and privacy events aren't held under any specific privileges or protections from discovery. These types of events also have to be reviewed according to different standards and laws. While the most important thing is speaking up about your concerns, reporting the right concerns to the right place helps demonstrate our values.



## What If?

**Q:** My supervisor directed me to do something that I believe is against policy and, maybe, the law. I don't want to do something wrong, but I'm afraid if I don't do what they asked, I may lose my job. What should I do?

**A:** Consider discussing the request with your supervisor to be sure you understand the facts and to make them aware of your concern. You can also approach a more senior manager if you are unable to resolve the concern with your supervisor. Other resources that may be used are Human Potential or the Compliance, Privacy & Civil Rights office. The Integrity Line is another option. Do not risk your job or the organization's future by taking part in an improper activity — there are appropriate actions you can take.

MultiCare strictly prohibits retaliation against employees who raise such concerns honestly and in good faith.

# What Happens When a Report is Received?

The Compliance, Privacy & Civil Rights office reviews and investigates all reports related to corporate compliance, privacy and civil rights. When reports are received about topics that are normally reviewed by Human Potential, Diversity Equity and Inclusion, or Patient Safety, the issue may be forwarded to those areas. For example, concerns that may be referred to Human Potential for resolution include, but are not limited to:

sexual harassment, employment law, drug and alcohol use, timecard theft, conflicts between coworkers, and job performance concerns.

Once a report is received it is reviewed and triaged to a member of the Corporate Compliance or Privacy & Civil Rights team for investigation. Investigations involve a review of evidence and may include interviews of any witnesses and the person(s) the report is about. Appropriate actions will be taken to address and correct any confirmed report of policy or law violations. These corrective actions may be disciplinary (like progressive guidance) or non-disciplinary (such as updating equipment). The reporter may not know the outcome of an investigation but understand that each report is taken seriously.

If wrong-doing is confirmed, we are committed to making the appropriate disclosures to regulators, patients, business partners, and the appropriate law enforcement authorities.



## Tying it Together:

We all have a duty to fully cooperate with a Compliance & Ethics Program investigation as we uphold the MultiCare values of Integrity and Excellence. We must provide all known information and may not withhold, destroy or tamper with records or potential evidence related to the matter being investigated. This ensures a fair investigation can occur and that the right information can be used to determine the appropriate follow up.

POINT MULTICARE



Manager Toolkit



## What If?

**Q: What is a “good faith” report?**

**A:** A good faith report is one where the reporter has a reasonable belief that the information provided relates to possible misconduct.

**Q: I witnessed an incident and was interviewed about the event. They asked why I did not report this issue. I was fearful of retaliation. Now I am being disciplined for not reporting. What should I do now?**

**A:** You have a duty to report issues and concerns. It is how we keep MultiCare ethical, safe, and a great place to work. By not reporting, you potentially put yourself, co-workers or patients at risk. This is a learning opportunity for you. Talk candidly with your manager about the incident and your concerns. Together, you can learn from this event.

# Leadership Expectations

Managers and leaders are role models and their behavior must exemplify MultiCare's values. Workforce members rely on their managers for guidance in difficult situations. Because of this, managers must foster a trusting and compliant culture and encourage their teams to bring concerns forward.

Specific responsibilities for leaders include:

- Ensuring teams' timely completion of required training.
- Talking openly about integrity and ethical behavior whenever possible.
- Being open to your team members bringing concerns to you and not reacting in way that could be interpreted as retaliation.
- Escalating concerns to the Integrity Line or Compliance, Privacy & Civil Rights office.
- Periodically reminding your team about MultiCare's non-retaliation policy.
- Sharing the policies that are relevant to the organization and your teams.
- Embracing the Standards and role modeling of ethical and values-based behavior.
- Contracting and purchasing through established processes.
- Ensuring your staff know how to report concerns and discussing the Integrity Line.
- Enforcing MultiCare policies and relevant laws in your team by implementing compliant processes and seeking guidance when appropriate.
- Participating in investigations and ensuring the completion of any action plans.



## Tying it Together:

As a leader, it is your duty to ensure that your teams are aware of changes and updates to MultiCare policies and procedures. Regular communication is expected to happen about both system-level and local policies.

As a leader, if you approve or participate in actions that violate the Standards, company policies and procedures, laws or regulations, or fail to cooperate in an investigation, you are subject to corrective actions.

MULTICARE POLICIES



Investigations Policy

MULTICARE POLICIES



Non Retaliation

MULTICARE POLICIES



Integrity Line

MULTICARE POLICIES



Contracting

MULTICARE POLICIES



Compliance & Ethics Program Charter

When you receive a report of any misconduct, escalate the report as necessary and address it in a timely manner. Determine if immediate action is needed. Imminent concerns about patient safety should be addressed before any other actions or reporting occur.

Significant ethical and compliance issues include situations in which the workforce is engaging in conduct that may be illegal or in violation of company policies or our Standards. To ensure a prompt investigation, report these issues as soon as you are made aware of them. Privacy concerns must be reported within 24 hours.


If you are not sure who to contact about a report, call the Integrity Line, or send an email to [compliance@multicare.org](mailto:compliance@multicare.org). We will provide direction and guidance.



## What If?

**Q:** How does reporting compliance concerns fit into becoming an HRO (high reliability organization)?

**A:** Just like speaking up with safety concerns, reporting compliance concerns provides MultiCare a chance to review policies and processes to do better. Reporting concerns allows the Compliance, Privacy & Civil Rights office to investigate as Subject Matter Experts, along with others who provide their expertise (Human Potential and managers). An investigation helps determine root causes and identify areas where we need to change; educational opportunities and more. Sometimes an investigation does identify violations of law that require specific follow up as well.



To Daily Tower EMERGENCY

# MultiCare Promotes an Ethical Workplace

*Our MultiCare values call us to ensure our organization is an ethical workplace where all employees are treated fairly, shown respect and provided the opportunity to succeed. We best serve our patients and community when we live our values and promote belonging in our shared employee experience.*

– Lisa Powell, SVP  
Chief Human Potential Officer



## Tying it Together:

We are committed to a safe and healthy work environment. When we work in an atmosphere of honesty and respect, we enhance our relationships with our coworkers, our patients and our community.

## Employment Rights and Diversity Within our Workforce

MultiCare promotes a work environment where employees are treated with respect, diversity is valued, and opportunities are provided. We believe that everyone enriches our culture by bringing diverse skills, experiences and backgrounds. All employees have a responsibility to do their part to ensure an inclusive and respectful workplace by creating a positive environment and recognizing the strengths and talents of others.

# Fair Treatment

## Labor Practices

We provide equal employment opportunities to all qualified candidates and employees. MultiCare prohibits discrimination in any work-related decision on the basis of race, color, creed, religion, age, disability status, national origin, marital status, sex (including pregnancy), sexual orientation, gender identity or expression, veteran or military status, citizenship or immigration status, or any other basis prohibited by law.

If you believe that inequitable or unfair conduct is occurring in the workplace, you should utilize the grievance or problem resolution processes defined in HP policy. If these resources don't resolve the matter, you may escalate the concern through leadership in the Human Potential department or by contacting the Integrity Line.

### MULTICARE POLICIES

 **Equal Employment Opportunity**

## Wages and Leave

MultiCare is committed to following applicable wage and hour laws and regulations and has a policy to define and ensure fair access to paid time off. All employees are responsible for adhering to defined schedules and following time off request processes as required in their areas of work.

## Disciplinary Measures

MultiCare has many policies requiring employees to adhere to legal and quality of care practices. When these requirements are violated, certain disciplinary actions may occur. Depending on the severity of the situation, these disciplinary measures may include a verbal discussion, a progressive guidance step or termination. There are policies outlining our practices in given situations available on Point MultiCare, under Policies. We have both a Human Potential policy as well as a policy which specifically addresses Compliance related issues.

### MULTICARE POLICIES

 **Performance Management**



## What If?

**Q:** *I believe I was not selected for a promotion because of my age (or gender, national origin, race, disability status, and so on). What should I do?*

**A:** Contact the Human Potential (HP) department at 253-403-MYHP (6947). The HP representative will be able to address the qualifications for the position and discuss your concerns with the hiring manager.

**Q:** *Our department recently hired a new manager. Since her arrival, I have been penalized for tardiness and absenteeism. There are other employees in my department with worse records than mine and I don't see them being treated in this way. I am concerned it is because of my (ethnicity, or national origin, gender, age, disability, and so on). What should I do?*

**A:** MultiCare prohibits unequal treatment of employees based on bias or discrimination. If you feel comfortable doing so, discuss your concerns with your supervisor first. If you don't feel comfortable or you are not satisfied with your supervisor's response, you may contact your Human Potential Partner and share your concerns so that management and/or HP can look into your concerns. Bias is defined as a preference toward or against something or someone that can come from our experiences, knowledge, beliefs, culture, or other people. While discrimination is the unjust or prejudicial treatment of different categories of people or groups, especially on the grounds of marginalized identities. Unfair treatment or consideration of a person based on their group, class, or identity rather than on individual merit.

# Safe Environment

MultiCare is committed to providing a safe environment for employees, patients, and visitors. We will take all necessary steps to reasonably prevent and protect employees from workplace violence. MultiCare has adopted an official Safety Code of Conduct that is rooted in MultiCare's values and informs the type of behavior expected in our hospitals and clinics. Employees are required to complete mandatory Workplace Violence Training in the Learning Management System as part of a comprehensive effort to create a safe environment for employees.


Disruptive behavior, by anyone—employees, physicians, contractors, agency, vendors, visitors, patients—is prohibited and should be reported immediately to your supervisor or Security. The Security department is on call to help address these situations.



## Tying it Together:

MultiCare Health System is committed to the safety and health of all people using MultiCare facilities, to include staff, physicians, volunteers, vendors, patients, and visitors. Acts of violence within the workplace are unacceptable behaviors.

### MULTICARE POLICIES

 **Disruptive Conduct By Staff, Volunteers, Contractors And Agency, Management Of**

### POINT MULTICARE

 **MHS Workplace Violence Prevention Plan**



## What If?

**Q: I heard that several kids were loitering near the parking garage as I was about to leave from my evening shift. I felt very uncomfortable about going to my car alone. What should I do?**

**A:** In many locations you can Call Security to arrange for an escort to your car. We provide this service to our employees for their protection.

**Q: I have been taking care of a patient who has been very rude, he has called me names and thrown things at me when he doesn't get what he wants. What should I do?**

**A:** Notify your supervisor of the patient's behavior. You can also call security to notify them of the inappropriate behavior. We are here to provide a safe environment for our patients while also providing a safe environment for the employee. Patients are not allowed to be disrespectful or violent.

**Q: A computer application we commonly use was updated and my colleague is the super user for our department. Every time I ask her for help using the updated system, she intentionally rolls her eyes and tells me she doesn't have time out loud, which embarrasses me in front of my colleagues. This has happened every time the system has been updated. Is this a form of workplace violence?**

**A:** This is a form of bullying, which is workplace violence. You should report this to your supervisor and report it as an incident report.



# Workplace Injuries

While we aim to have zero occurrences of work-related injuries, they do occur, and it is critical that these accidents and incidents are reported. Laws require us to record and report these incidents, and doing so helps us put better mechanisms, processes and practices in place to avoid them in the future. If you are involved in an incident, you must report it promptly to your immediate manager and follow the required procedures.

MULTICARE POLICIES  
 Work Related Injuries, Management Of



## Tying it Together:

One way to prevent injuries is to follow the High Reliability Organization (HRO) standard practice self-check by using STAR:

- Stop:** Pause for one second to focus your attention on the task at hand
- Think:** Consider the action you're about to take
- Act:** Concentrate and carry out the task
- Review:** Check to make sure that the task was done right and that you got the right result

**STAR** is the most effective way to be present and stay focused to avoid causing distractions or being distracted yourself.

# Substance Misuse

It is MultiCare's intent to maintain a drug-free workplace, to provide a safe and healthful working environment for all employees, and to comply with all applicable laws governing this area. We also take seriously our responsibility to ensure public safety. We will not put our patients or our colleagues at risk due to substance misuse behaviors. It is prohibited under MultiCare policy to be under the influence of alcohol, marijuana or other unauthorized controlled substances while at work, including prescribed substances that may cause impairment. This includes all providers of care, employees, volunteers and contractors. MultiCare has an employee assistance program to support employees as needed.

## MULTICARE POLICIES



Employee Impairment

## MULTICARE POLICIES



Substance Misuse in the INW



## MultiCare Understands Our Responsibility to Others

*The communities we serve are richly diverse and the individuals and families who live in them come from all walks of life. It is our duty and privilege to care for our patients in ways that honor that diversity and embrace those differences. The health care we provide must be more than just medically appropriate, it must be compassionate, kind and respectful as well.*

– **June Altaras**, Executive VP and Chief Quality, Safety and Nursing Officer



### **Tying it Together:**

MultiCare is committed to eliminating healthcare disparities. In 2015 MultiCare joined the American Hospital Association's #123 for Equity Pledge to Act Campaign. The Center for Health Equity was formed in 2016 to ensure the cultural, linguistic and spiritual needs of our patients and their families are respected. MultiCare also began participating in the HealthCare Equality Index in 2018.

### **Inclusivity and Diversity**

MultiCare is committed to providing an inclusive environment for our patients and communities. At its core, this means respecting the diversity of the communities we serve. The primary way we do this is by honoring patient rights and following our commitment to non-discrimination.

# Discrimination and Harassment

MultiCare is committed to an environment free from discrimination and harassment. We forbid discrimination with respect to race, color, creed, religion, age, disability, national origin, marital status, sex (including pregnancy), sexual orientation, gender identity or expression, veteran or military status, citizenship or immigration status, or any other basis prohibited by law.

MultiCare does not take part in discriminatory marketing, medical management, contracting practices, or other activities designed to inappropriately prevent or discourage participation in services.

Some examples of discriminatory or harassing behavior are:

- Failing to provide Interpretive Services to our non-English speaking and deaf/hard-of-hearing patients.
- Procedures that place additional barriers or requirements in place for specific groups of people.
- Epithets, derogatory comments, slurs, mocking or obscene gestures, unwanted advances or invitations.
- Derogatory posters, screen savers, backgrounds, cartoons, drawings or gestures.
- Assault, intentional blocking or interfering with normal movement.
- Inappropriate words, labels or symbols used as IDs, passwords, computer sign-offs or greetings.
- Aggressive, intimidating or “bullying” conduct directed towards someone for any reason.
- Threats and demands to submit to requests in order to maintain employment or avoid some other loss, and offers of job benefits in return for favors (quid pro quo).

If you think there is a discriminatory practice or receive a report of patient discrimination, report it to the Integrity Line or Privacy & Civil Rights Office or HP.



## Tying it Together:

A bystander is someone who witnesses an event, but is not part of it. It is important that bystanders intervene and report when discriminatory or harassing behavior is witnessed.

Why should bystanders report? Discriminatory behavior does not reflect MultiCare’s values. Additionally, the behavior could get worse and others may be targeted.

### MULTICARE POLICIES



#### Non-Discrimination



## What If?

**Q:** *I have been tasked with the purchase of new examination tables for the clinics I oversee. Besides stewardship and procurement policies, is there anything else I need to keep in mind?*

**A:** Examination tables, like many other standard pieces of equipment in clinical settings, should be designed to provide an inclusive care experience for our communities. Make sure the tables you bring into your clinical settings can accommodate individuals with limited mobility and varied sizes. Keep accessibility in mind when making any large purchases or updates in any facility. The Privacy & Civil Rights Office can help point you in the right direction for requirements and best practices.

# Patient Rights

Patient rights are built into the foundation of the care we provide. Patients must be informed of their rights and we are not allowed to violate them. These rights are outlined in state and federal laws as well as MultiCare policy. The law provides additional protections for minor and adolescent patients.

Some examples of patient rights:

- Participation in care decisions.
- A safe and harassment-free environment of care.
- Family visitation.

Violations of patient rights should be reported without delay.

## POINT MULTICARE



Patient Safety



## What If?

**Q:** *I overheard two nurses at the nurses' station gossiping in loud voices about one of the patients on the floor. What should I do?*

**A:** Gossiping loudly violates the patient's privacy and may also constitute harassment. If you feel comfortable, you can tell them to stop. If you do not feel comfortable speaking to them directly, you should report your concerns to your supervisor.

**Q:** *My role at MultiCare doesn't involve direct contact with patients, so I don't need to use AIDET, right?*

**A:** All employees at MultiCare are expected to use AIDET (Acknowledge, Introduce, Duration, Explain, Thank You) as the communication framework for all interactions. Some examples are: helping visitors who might become lost in the hallway, the opening of a meeting or a presentation, providing communication between departments as well as confirming assignments/handoffs with colleagues, etc.



## Tying it Together:

The patient brochure that is provided annually in ambulatory settings and at each hospital visit contains important information that keeps MultiCare in compliance with many legal requirements. In addition to the consent to treat, the brochure outlines a patient's communication options, privacy rights, general patient rights and how to report a concern. The brochure also outlines the patient's responsibilities, including obligations to pay for services and treat staff appropriately.

# Privacy Rights

In addition to the core patient rights, patients have specific rights related to privacy and their medical records. These rights are outlined in federal law (HIPAA) and include:

- The right to receive a Notice of Privacy Practices;
- The right of access to their health record;
- The right to amendment of the health record;
- The right to an accounting of disclosures;
- The right to request a restriction of disclosures;
- The right to confidential communications;
- The right to have a health care representative;
- The right to file a complaint.

## MULTICARE POLICIES



If a patient has a concern about their privacy rights, they can be directed to the Integrity Line or to the Notice of Privacy Practices, which is included in the patient brochure.



## What If?

**Q:** *My co-worker has secretly recorded conversations with his manager. That doesn't seem right to me. What should I do?*

**A:** No employees should record conversations without the express, written consent of the individual being recorded. Doing so would violate the person's right to privacy, as well as state and federal law. Notify your manager, Human Potential, or the Compliance & Ethics Program with your concern.

**Q:** *I am a clerical employee working in a clinical setting. I noticed that a child who had come to the doctor for DPT immunization had actually received only a DT vaccine. When I mentioned this to the nurse, she seemed annoyed but said she would take care of it. Have I fulfilled my responsibility if I am still uncertain that appropriate follow-up has occurred?*

**A:** If you remain uncertain that appropriate action has been taken, continue to pursue the issue. This will require tact, because you cannot assume that the nurse did not address your initial observation. If you are not comfortable asking what follow-up occurred, speak to your supervisor and request that he or she follow up for you. Mistakes can occur in even the best-managed medical practice. Quality patient care requires vigilance from everyone involved.

# Quality Care

MultiCare is committed to compassionately delivering safe, appropriate, effective, quality care to our communities. Patient care must be appropriate and designed to meet the intended outcomes of the Plan of Care. Needing medical care can cause stress, anxiety and fear for both the patient and their family. Patients and families must always be treated with sensitivity, kindness, respect, and professionalism.

MultiCare will continue to seek new approaches to increase the quality of care delivered to our patients, while ensuring that care is delivered in a cost effective manner. We shall observe all applicable standards of professional practice in all of our facilities and programs. Everyone at MultiCare has a role and responsibility to ensure patient safety and quality of care/services provided to our patients, their families, and our community.



## What If?

- Q:** *I observed an employee use LEARN (Listen, Empathize, Apologize, Respond, Nurture with a thank you) with a patient who was given the wrong day for an appointment and had to return the next day. The patient was given 2 gas cards worth \$5 each. Is it okay to give more than one card for service recovery?*
- A:** Depending on the severity of the issue, the employee involved can use their own discretion to determine the amount of a token gift. Typically, the gift cards are used for minor inconveniences. In this case, the employee is authorized to give two cards. In fact, all employees are authorized to give up to \$20 value for service recovery. For a more severe issue, connect with your supervisor or call the Patient and Family Relations team for additional support on the best way to respond to the service issue.



## Tying it Together:

MultiCare is a High Reliability Organization (HRO). Everyone – from physicians to support service employees – is part of Our HRO Journey.

MultiCare is committed to putting safety first in our decisions and to creating a strong safety culture. As health care employees, we work in a continuous high-risk environment. Unfortunately, in health care, our mistakes can result in harm to a fellow human being that can be devastating, even fatal.

We know health care can be better. That's why we are working to reduce errors by combining a culture of trust with heightened safety awareness and systems that are intentionally designed to mitigate risks and raise performance to the highest levels.

Using the HRO behaviors gives us an opportunity to reinforce safety, quality and reliability practices throughout MultiCare, in both clinical and non-clinical settings alike.

# Fundraising and MultiCare Foundations

MultiCare's Foundations are parts of our business that focus of fundraising and charitable activities. As a nonprofit healthcare system, our Foundations work to ensure outreach programs have resources and manage the donation processes to and from MultiCare.

Our Foundations partner with people like you to create healing and a healthy future through philanthropy. Our employees, volunteers and community members give back to the health care causes closest to their hearts, in ways that help provide children and families access to the quality health care they deserve, through all stages of life.



## Sustainability

Driven by our value of stewardship, MultiCare is dedicated to protecting the planet and to creating a positive environmental legacy for future generations as we operate and grow to better meet the needs of our community. We have set ambitious goals for mitigating our organization's environmental impact, including energy use, greenhouse gas emissions, water consumption and waste diverted from landfills. But it will take participation from every member of our workforce to help achieve these goals.



### Tying it Together:

At MultiCare, we expect employees to embrace the responsibilities of stewardship and make a personal commitment to supporting sustainability by:

- Conserving energy where possible, including powering down equipment when not in use and adhering to energy conservation standards and protocols.
- Minimizing the use of water where possible without risking safety and health considerations.
- Reducing, reusing and recycling waste generated in your area where feasible.
- Taking an active role in creating ways to conserve resources and implement sustainable, environmentally friendly practices in your area.

# Employee Assistance Program

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Our responsibilities aren't only to our patients. Health care can be a tough job and life happens. Your wholeness and well-being are important to MultiCare, too. MultiCare offers an Employee Assistance Program (EAP) as a resource for you, your household members, and your children (under age 26).

The EAP includes up to five sessions at no charge with clinical experts who can assess your concerns and develop a plan of action with you. The EAP also includes connections to legal and financial experts in certain situations.

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Here are some services that the EAP offers support for:

- Anxiety and/or depression
- Couples/relationship/parenting concerns
- Crisis support
- Domestic violence
- Eldercare
- Grief and loss
- Home ownership
- Legal and financial
- Substance use and addiction
- Work conflicts
- And more

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EAP Program at  
First Choice





## MultiCare Does the Right Thing

*As healthcare workers, we have a special place in society. People place their lives in our hands when they are the most vulnerable.*

*In order to keep our community healthy and provide care to those in need, we all must act with the utmost integrity. This includes financial stewardship so that we can direct our resources to support the health of our community.*

*It also requires that we avoid conflicts and situations that might erode trust or cause people to question our motives. If we expect people to trust us, we must act with uncompromising integrity and honesty.*

– **David O'Brien, MD, MS**, Executive Vice President, Chief Physician Officer, Chief Executive – South Sound Region and Capital Pacific Region



### **Tying it Together:**

We conduct business and serve the community with integrity, honesty and fairness. We demonstrate these qualities through truthfulness, the absence of deception or fraud and respect for the laws applicable to our business. Acting with integrity and doing the right thing is everyone's job.

# Be Aware of Fraud, Waste and Abuse

We are good stewards for our patients, the Medicare and Medicaid programs and the Medicare Trust Fund. It is our responsibility to protect against inappropriate and deceitful actions. We all play a part in detecting, correcting and preventing fraud, waste and abuse at MultiCare, and we are all expected to report suspicions or concerns related to the accuracy and appropriateness of our billing. MultiCare will not retaliate against anyone for making these reports in good faith.

All employees, patients, physicians and vendors also have the right to report billing concerns to the government at any time.

## Compliant Billing Practices

Our billing must comply with the requirements of state and federal regulations and payers and conform to all payer contracts and agreements. We submit charges on the principle that if the appropriate documentation does not exist, the service is not billable. We have standardized processes to determine patient financial need and we don't waive co-pays and deductibles outside of those standards.

Employees who suspect improper documentation or billing must report the concern immediately.



## Tying it Together:

Fraud, waste and abuse are defined as follows:

**Fraud** – Is an intentional act of misrepresentation, deception, or concealment, or an attempt to do so to gain something of value.

**Waste** – Is the overutilization of services or other practices that, directly or indirectly results in unnecessary costs to federal, state and private healthcare programs. It is not generally considered to be caused by criminally negligent actions, but by the misuse of resources.

**Abuse** – Any action(s) that may, directly or indirectly, result in: unnecessary costs to federal health care programs and commercial insurance plans, receipt of improper payments, receipt of payments for services that fail to meet professionally recognized standards, or payment for non-medically necessary services.



## What If?

**Q:** *The supervisor of my department issued a memorandum indicating that while it may be technically unlawful to bill for certain medical devices, he knows from a conversation with colleagues in neighboring hospitals that everyone is ignoring the Medicare directive. I feel uneasy with these instructions. What should I do?*

**A:** In this case, if you feel comfortable doing so, discuss your concern with the supervisor. If you aren't satisfied with their explanation or you don't feel comfortable approaching them on this issue, contact their supervisor. Keep asking questions until you get an answer that makes sense to you. If the concern is not addressed, contact the Corporate Compliance Office or the Integrity Line to report the issue.

# Stark/Anti-Kickback and Non-Monetary Compensation

Under the Stark and Anti-kickback law it is illegal for physicians and other health care providers to knowingly and willfully accept bribes or other kickbacks in return for generating Medicare, Medicaid and other federal health care business. The federal government applies severe financial and other penalties for violation of these laws, including large monetary penalties and exclusion from federal health care programs. MultiCare prohibits any payment that may be viewed as a bribe, kickback, or inducement.

## Anti-Bribery

MultiCare prohibits any form of bribery or corruption. We must not, directly or indirectly, make or offer bribes, kickbacks, or other payments of money or anything of value to anyone, including officials, employees, or representatives of any government, company, or public or international organization, or to any other third party, for the purpose of wrongfully obtaining, retaining or directing our business. This includes giving money or anything of value to any third party, where there is reason to believe it will be passed on to anyone involved in the business decision process for the purpose of influencing the decision.



## Tying it Together:

Physicians and health care providers must not refer patients for services in which the provider has a financial interest. Payments and contracts between MultiCare and health care providers must be reasonable, based on fair market value and non-monetary compensation must not exceed federal limits.



## What If?

**Q:** *I have found that our competitors are providing illegal inducements to physicians and are hindering our ability to compete. What should I do?*

**A:** Improper behavior by a competitor does not justify similar behavior on our part. Notify your supervisor of this situation, providing any facts available to you. It is your supervisor's responsibility to notify MultiCare Legal Services and/or Executive Management so that MultiCare can take appropriate action.

**Q:** *What should I do if a physician asks me to provide payment or compensation in exchange for referrals to my facility?*

**A:** Such a request is against our principles and is likely unlawful. Discuss the situation with your supervisor, a higher-level manager, or another MultiCare resource such as the Integrity Line. Any supervisor or manager receiving this type of information should notify Corporate Compliance or Legal Services.

**Q:** *I am responsible for auditing expense reports. Once, I received a report covering the purchase of gifts totaling several hundred dollars bought for one of our physicians who refers a number of patients to us. Is that acceptable?*

**A:** While such gift giving may have been common in health care at one time, any gift or consideration of value that may appear to be an inducement for referrals is prohibited by MultiCare and by law. Bring this situation to the attention of your supervisor, a higher-level manager, or the Integrity Line.

# Avoid Conflicts of Interest

A conflict of interest can happen anytime something you do outside of the workplace interferes with the work you do inside the workplace. It isn't possible to list every situation that could present a conflict, but there are certain situations where conflicts typically arise. Conflicts can also exist when a time commitment to a personal or otherwise unrelated business interest impacts your ability to meet the expectations of your MultiCare role. Being able to recognize a potential conflict can help you avoid one.

When making decisions related to MultiCare, you have a duty to act in our company's best business interests and avoid even the appearance of a conflict. If you discover that a personal activity, investment, interest or association could compromise — or even appear to compromise — your objectivity or your ability to make impartial business or patient care decisions, disclose it immediately to your manager and Corporate Compliance. Many conflicts can easily be avoided or addressed if they are promptly disclosed and properly managed.

Employees are required to disclose certain types of relationships and potential conflicts of interest when the potential conflict arises and at least annually. The Corporate Compliance Office will distribute annual questionnaires to board members, applicable management, employed providers, and workforce determined to serve in key functions. All persons who receive the annual request for disclosure are required to complete it truthfully and return it to Corporate Compliance by the given deadline.



## Tying it Together:

As representatives of MultiCare, we must all act with integrity in conducting MultiCare business in a manner that does not put our ethics to question. Avoiding conflicts of interest is an important way to ensure that our business relationships are free from even the perception of self-benefit or promotion.

### Some Examples of Potential Conflicts of Interest

1. An MHS employee sits on the board of an organization with which MHS does business.
2. A friend or family member works for a company with which MHS does business.
3. A provider receives payment from a drug or medical device manufacturer for influencing others to utilize that company's products.

#### MULTICARE POLICIES



#### Conflict of Interests



## What If?

**Q:** *I'm a physician who has gained recognition as an expert in my field. I regularly receive requests from other organizations, such as medical societies and device manufacturers to speak at meetings and conventions for compensation. Can I accept these invitations if I do the speaking on my own time?*

**A:** There is no simple answer to this question. Even if the work will be done outside of your MultiCare shifts, you should never accept an offer for speaking engagements related to your role or medical expertise without first receiving approval from management. In order to evaluate your request, your manager will need to understand the terms of the agreement for outside work, whether the payment you are being offered is at fair market value and if the work you would be doing reflects your own views, has scientific merit and is not biased or intended to influence the organization's sales. Your manager will work with Corporate Compliance to determine if the work is acceptable within the requirements of your employment contract, MultiCare's expectations for ethical business practices, and the law. If the outside work is approved, there may be requirements for handling payments, requesting reapproval on a regular basis, and notifying MultiCare if any aspect of the arrangement changes.

**Q:** *I have an outside business selling fitness products. Can I use company bulletin boards or interoffice mail to advertise these products to other MultiCare employees?*

**A:** No. Products and services not offered by MultiCare should not be promoted during working hours or on MultiCare property. Nor should you use MultiCare's name, its facilities, or resources (including telephones, copiers, email or your work time) to sell non-MultiCare services or products. However, you are free to engage in an outside business, which does not pose a conflict of interest with MultiCare, on your own time and off company premises.

**Q:** *Is it appropriate to purchase stock in a company with which MultiCare does business?*

**A:** If you have influence over the purchase of goods or services from the vendor, you should avoid ownership of the stock of the vendor. This would most likely apply to management personnel and employees of the purchasing department.

# Gifts and Gratuities

As a MultiCare employee, you and your family members are prohibited from receiving gifts, loans, entertainment or any other item of value from a person or organization in exchange for business access, favors and referrals. If you receive any substantial gift or favor, it must be returned and your supervisor and Corporate Compliance must be notified. The gift and gratuities policy allows for an exception if the gift is of nominal value (less than \$100) and extended as a business courtesy, such as an occasional business-related meal or entertainment of modest value.

Payments or consideration of value given to physicians or other parties to influence the flow of referrals to MultiCare are inducements and are prohibited. Prohibited inducements can include gifts, entertainment, or other consideration given to government employees, physicians, or any other party in a position to influence patient referrals. Gifts and gratuities given to physicians to influence the ordering of drugs or supplies are also prohibited.

The Gifts and Gratuities policy provides greater detail on acceptable and prohibited gift scenarios.

## MULTICARE POLICIES

 **Gifts, Gratuities and Business Courtesies**



## What If?

- Q: My department is planning a celebration for National Department Week. Is it okay to call our vendors and ask them to contribute money for our department party?**
- A:** No. Only the Foundation should be soliciting money from our vendors. If the vendors offer to contribute “things” — such as food and giveaways, then it might be fine depending on the situation. If they offer to contribute funds, they should be directed to the Foundation where a special purpose fund can be established for department use. But a department, with the authority to approve use of the vendor, and the amounts of purchases, should not be soliciting from the vendors. This may appear to be pressure — if they don’t contribute, then we won’t purchase from them anymore, or a conflict of interest in that if they do contribute, they will receive favored treatment. If in doubt, call the Corporate Compliance Office for input.
- Q: In appreciation for our business, suppliers to MultiCare occasionally invite me out to dinner or sports events. Is it acceptable for me to go?**
- A:** In the absence of specific department policy prohibiting such activities, you may accept these types of invitations if they are within the bounds of the law, good taste, moderation, common sense, and MultiCare policy. It must also be of nominal value (MultiCare gift value limit is \$100). Your activities must not only be acceptable according to company policy but must also avoid creating an appearance of improper behavior. If you have purchasing authority however, you must take care to ensure that this could not be perceived as a conflict of interest. The event must be hosted by the vendor; it is not acceptable to just accept tickets as a gift or gratuity.



## Tying it Together:

There are times when patients and their families want to recognize exceptional service of our staff. Gifts of nominal value may be accepted including flowers, candy or gift baskets of less than \$100. It is never appropriate to accept gifts of cash or gift cards. Employees are encouraged to direct patient recognition gifts to our Foundations.

# Ensure the Accuracy of Information

Attention to accuracy is critical in everything we do. It is every employee's responsibility to prepare all business and patient records accurately and completely.

## MULTICARE POLICIES

 Record Retention

## Medical Records

Standards and requirements for the completion of patient records must be followed to ensure integrity of the record and avoid the potential for harm due to inaccurate documentation. Medical record documentation is the basis for accurate coding, charging and billing. Medical records may be amended to correct errors or update documentation, but only in accordance with established medical record procedures, and not to cover up errors or obtain payments we aren't entitled to. Refer to the policy on record retention for information on required timelines for storage of records.

## Financial Records and Internal Controls

MultiCare is committed to accurate financial reporting and maintaining a framework for internal control over financial reporting. Financial record keeping must not contain false or misleading information and transactions must be recorded in accordance with generally accepted accounting principles and internal policies. Federal filings, such as tax returns, licensing documents and cost reports must be submitted with assurance of compliance with state and federal requirements.

## Virtual Health

MultiCare supports a robust Virtual Health program with a vast set of virtual capabilities to address all aspects of the care continuum. We utilize a number of different technologies to provide bi-directional video appointments, in-hospital specialty consultations with advanced assessment capabilities, and advanced remote monitoring. Engaging in Virtual Health activities requires more than just a webcam and an appointment. Clinicians are required to complete training for both the technology platforms and a telehealth learning module to understand basic legal and billing requirements. Additionally, clinicians are required to use only MultiCare approved platforms when delivering Virtual Healthcare.



## What If?

**Q:** Patients sometimes call physicians and ask them to change their medical coding (either CPT or ICD-10) in order to obtain better insurance reimbursement. If a physician requests that the Physician Billing Office make these changes, is this appropriate?

**A:** It is only appropriate to make coding changes if the changes are legitimate corrections and the medical record documentation supports the requested changes. If you are uncertain that what you are being asked to change is legitimate, have the patient's medical record reviewed by the provider or a coder before making any change.

Provider documentation should support the clinical findings and not be altered to enhance reimbursement or to reduce patient liability. We can also refer patients in need to our Financial Assistance program.

## MULTICARE POLICIES

 Virtual Health Policy

## POINT MULTICARE

 Virtual Health Homepage

# Cooperate with Government Investigations

Government investigations are a fact of life in today's healthcare environment, and procedures for cooperating with these investigations may be complex. MultiCare takes a collaborative approach to government investigations, and compliance with laws, rules and regulations is our priority. If an employee is approached by any person who identifies themselves as a government investigator, they should contact Legal Services immediately stating that the call is concerning a potential government investigation. MultiCare Legal Services will assist in verifying credentials of government investigators and coordinate the proper procedure for responding.

In some cases, government investigators, or persons presenting themselves as government investigators, may contact employees outside of the workplace, during non-work hours, or at home. Do not feel pressured to talk with the person under such circumstances without first contacting Legal Services or your personal attorney. It is the legal right of employees to contact legal counsel before responding to questions by an investigator.

Should a MultiCare employee receive a subpoena or other written request for information (such as a Civil Investigative Demand regarding MultiCare), the employee should contact Legal Services immediately and before responding.

## Political Activity

MultiCare works to ensure that policy makers at the state and federal level are familiar with the mission and values of our system. It is important that we speak with one voice and ensure clear communication with elected officials and their staff. There are many ways employees may join in the cooperative effort of education and advocacy. Contact the Government Relations team if you're interested in participating in the legislative system in support of MultiCare's goals.

Employees may not use company funds to contribute to a political party, committee, organization or candidate in connection with a political campaign. You may, of course, make personal contributions of your own funds to the campaigns of candidates of your own choice. Such contributions are not reimbursable by the company.



### Tying it Together:

MultiCare employees must never:

- Destroy or alter any company document or record, including emails or any other electronic documents, in anticipation of a request for the document or record by a government agency or court,
- Lie or make false or misleading statements to any governmental investigator, or
- Attempt to persuade any other company employee, or any other person, to provide false or misleading information to a government investigator or to fail to cooperate with a government investigation.



### Tying it Together:

Whether it's sending an email to our elected officials and the governor on issues such as mental health funding or testifying before a committee on behalf of MultiCare, the synergy we can obtain by working together will help our organization succeed exponentially.





# MultiCare Safeguards Our Company

*As stewards of valuable community health care resources, we must ensure that appropriate safeguards are in place to protect the reputation and assets of MultiCare. We want our patients, caregivers and community members to be assured that we aim to serve the community (for years to come or) in the long run.*

– **James Lee**, EVP, Population Based Care & Chief Financial Officer



## **Tying it Together:**

We care for our patients, we care for our employees, and we must also care for our organization. By following policy and committing to our value of Stewardship, we are all fulfilling our obligation to developing, using, and preserving our resources in a way that benefits our patients and community.

# Confidential and Proprietary Information

All employees have a duty to protect confidential and proprietary MultiCare information by not sharing information outside of the organization and not providing information to competitors. Only access and distribute information according to policy and for valid business purposes. Work products developed as a MultiCare employee are MultiCare property. Employees are prohibited from taking MultiCare work products with them when their employment with MultiCare ends. The obligation to protect this information from inappropriate use or disclosure continues even after employment ends.



## Tying it Together:

Some examples of confidential and proprietary information:

- Contracts with providers and vendors;
- Employee lists;
- Financial data;
- Patient lists and patient health information, even if 'deidentified';
- Pricing policies and rates;
- Productivity information;
- Strategic plans;
- Vendor lists.



## What If?

**Q:** *I was told by a MultiCare employee that I could supply a list of our clients to any outside source. Is this true?*

**A:** Client lists are a valuable asset and should never be disclosed to anyone outside of the company without specific management approval. Patient privacy rights may also apply. Ask your supervisor about any request you receive for such a client list.

**Q:** *A coworker who developed training materials (software program, audit process, and so on) for MultiCare is marketing these materials on his own time to other companies. He intends to keep the proceeds for his own use. Is this ethical?*

**A:** Generally, MultiCare owns all proprietary information including "intellectual property" (computer programs, training materials, processes, marketing strategies) created by employees while on the job or while using MultiCare resources. This is a complex area and you should raise this issue with your supervisor or Legal Services. MultiCare proprietary information may not be used for personal gain.

# Privacy and Security

Much of the information we collect from patients and community members is sensitive and protected under various privacy and information security laws. In addition, we have contracts and other requirements we must abide with. Our Privacy and Information Security programs work together to safeguard this information, work essential to preserving patient and community trust as well as MultiCare resources.

Our Privacy & Civil Rights Office manages MultiCare's Privacy Program. This program ensures that we are collecting, accessing, using, and sharing patient information appropriately, according to law, and other agreements.

Information Security works to ensure the confidentiality, integrity and availability of data. This could include access provisioning, preventing cyber-attacks, and making sure that electronic devices are secured and password protected.

Without fail, MultiCare team members are expected to follow MultiCare policies and procedures related to patient and confidential information.

POINT MULTICARE

 [Information Security site](#)

POINT MULTICARE

 [Privacy & Civil Rights site](#)



## Tying it Together:

There are many ways you contribute to the privacy & security of information at MultiCare. Some of the most common ways are:

- Accessing the minimum amount of information needed to do your assigned job, whether this is patient care or administrative work (minimum necessary standard).
- Know what the security requirements are for devices and information use in your role.
- Discuss patient information only when required for your job and when laws permit you to do so.
- Keep doors and restricted areas clear from unauthorized access.
- Log off or lock workstations when they are unattended.
- Wear your identification badge at all times while working.
- Ensure employees are onboarded appropriately and terminate access when they are no longer employed or providing services.



## What If?

**Q:** How does wearing my badge apply to privacy and security?

**A:** Physical security is an important way to protect the privacy and security of information. Your badge lets other team members know that you belong in an area. Your badge also helps identify you to patients, so they know that you are a representative of MultiCare.

**Q:** What about visitors and others who are in restricted areas?

**A:** If you see someone who you do not recognize or you think may be in a space inappropriately, please clarify that they should be there. You can ask if you can assist them or help them locate another location. If you feel unsafe, you can reach out to a leader or Security Services for assistance.

# Due Diligence/Anti-Trust

As MultiCare continues our mission, we all must be committed to competing vigorously on MultiCare's behalf. However, we protect MultiCare by competing wisely and fairly.

It is unlawful to agree, or attempt to agree, with competitors to fix prices or divide geographical markets. You should not, for instance, share pricing or other confidential information with a competitor. Particular care should be taken in pursuing joint ventures or alliances with other healthcare providers.

When starting a new partnership, affiliation or transaction, MultiCare carefully proceeds to avoid crossing a line and violating the community's trust. Additionally, before we enter into new relationships, we must carefully review a wealth of information to ensure we are making the right long-term decisions and honoring our value of stewardship.

Seek advice from your supervisor or manager before taking any action that may compromise fair competition or compliance with antitrust laws. All joint ventures and alliances proposals should reach out to Legal Services for their guidance and expertise.

POINT MULTICARE



Legal Services

# Brand Stewardship

Our brand is about so much more than marketing. Everyone has a role in our brand, and it is one of the most valuable assets we have as an organization. It connects all of us who work at MultiCare to each other and to the many constituents we serve. It instills a level of trust and reassurance so critical as a healthcare provider. And, it identifies us with who we are, what we do, and how we do it, in ways that are uniquely MultiCare.

We can be good stewards of the MultiCare brand by using approved logos, correctly formatted email signature blocks and, most importantly, by exhibiting our values in every action we take.

POINT MULTICARE



MHS Logos and Templates



## Tying it Together:

MultiCare and our affiliates advertise to inform the community of the availability and value of services and products, to provide education, and to share MultiCare's views on healthcare related public policy. We must remain mindful of the trust the public places in us to provide accurate, balanced information.

- Advertising should be honest and accurate and, when presenting views on issues, clearly distinguish opinion from factual data.
- Advertising should not disparage, demean, or caricature competitors, customers or patients. We respect that our competitors are also working diligently to provide high quality health care services to our community.
- Advertising should not exploit customer or patient fears as a key motivating factor. Direct comparisons should be avoided.

# Corrective Actions

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Corrective actions come in a variety of forms but are one of the most important ways to safeguard MultiCare and ensure we are in compliance with law or regulation. Each time there is an investigation, accreditation survey, internal audit, government review, or root cause analysis, we are likely to have one or more corrective actions assigned. These are improvement steps we must take to re-align with requirements and to prevent the same thing from happening in the future.

Corrective actions may be disciplinary, but more frequently they involve policy reviews, education, technical fixes and resource reviews. If you are a leader, it is important that you ensure completion of all corrective actions assigned to you in a timely manner.



## Tying it Together:

Corrective actions are also called “mitigative actions,” “management plans” and “actions to consider.” Whatever it is called, it is an important step for aligning work to our mission as well as the laws and standards we are required to follow. As we move towards becoming a HRO, remedying known risks and issues will continue to be a priority.

# Protect MultiCare Assets

Our assets include everything that our company owns or uses to conduct business. Each of us is entrusted with the care of these assets, so be proactive in safeguarding them from loss, damage, theft, waste and improper use.

MultiCare does not tolerate theft in the workplace. Do not take what doesn't belong to you, including materials, equipment, drugs or anything else from the company, our patients or your fellow employees. When situations require use of MultiCare equipment or other property outside of the workplace, authorization must be given through management and only for the intended purpose.

## Diversion

Diversion includes the taking, possession, use or sale of prescription medications (controlled and non-controlled substances) that are not prescribed for you. Employees who take, possess, sell or divert medications (both controlled and non-controlled substances) will be subject to state and federal sanction as well as the possible loss of their licensure and ability to work in healthcare. MultiCare's diversion prevention program includes proactive monitoring of medication use and access patterns. Employees found with unusual access or practice patterns or those not following medication handling policies may be subject to internal investigation for potential diversion.

Anyone who has knowledge or suspicion of drug diversion is required to report the concern immediately. Reports can be made confidentially through the Integrity line and retaliation will not be tolerated. MultiCare will act swiftly to investigate reports of drug diversion.

## Procurement

MultiCare has policies and procedures that dictate the criteria and process for vendor selection and purchasing, to ensure the decisions are made objectively and fairly. Only persons authorized to enter into contracts should attempt to do so, and no one should use their position to advocate for or against a vendor unfairly or for personal gain.

### MULTICARE POLICIES

 [Contracts](#)



## Tying it Together:

Tying it Together: Protecting our assets doesn't have to be hard. Here are some simple things you can do as part of your daily routine:

- Keep your laptop secured, not left alone in your car.
- Lock file cabinets and offices when unattended.
- Minimize overtime and premium hour wages.
- Ensure files and documents are destroyed appropriately.



## What If?

**Q:** *I have a co-worker who uses the internet at work a lot. This affects my work as I need information that my coworker should be providing to me. My supervisor thinks it is my fault. I don't want to get my co-worker in trouble, but I don't want to get blamed either. What should I do?*

**A:** Tell your supervisor that you think your co-worker is using the internet excessively. This can be readily investigated. While the Internet is available to most MultiCare employees, time spent at work should not be used for personal use. Incidental use (on breaks and lunches) is fine; informing your supervisor of this will help alleviate concerns about excessive use.

# MultiCare Is a Good Community Citizen

## A message from Florence Chang, President

As a not-for-profit health care organization, we have had the privilege of providing vital health and wellness services to the communities we serve since our founding in 1882.

But the communities we serve are not just the places where our buildings are and the places where we work. They are where we live, where we make our homes and raise our families. And so our dedication to these communities goes well beyond health care.

As an organization we demonstrate that dedication by committing to actions such as:

- Helping to build community assets, engage the community in collaborative planning, develop and support vital community programs and partner with like-minded organizations.
- Operating MultiCare in ways that conserve the ecosystems on which we depend.
- Advancing the health of all in our communities, including the most vulnerable among us.

As MultiCare employees, we demonstrate that dedication by living our values in action — Respect, Integrity, Stewardship, Excellence, Collaboration and Kindness — each moment, each day.



**RESPECT:** We affirm the dignity of each person and treat each individual with care and compassion.

**INTEGRITY:** We speak and act honestly to build trust.

**STEWARDSHIP:** We develop, use and preserve our resources for the benefit of our customers and community

**EXCELLENCE:** We hold ourselves accountable to excel in quality of care, personal competence and operational performance.

**COLLABORATION:** We work together recognizing that the power of our combined efforts will exceed what we can accomplish individually.

**KINDNESS:** We always treat everyone we come into contact with as we would want to be treated.

# Believing in Our Values

The MultiCare Standards for Business Conduct define the expectations for how our organization does the right thing, exemplifies our values and approaches the work that supports our mission. While every possible example or scenario may not be expressly addressed, the spirit of the Standards goes beyond the specific topics and examples that are mentioned. Everyone should understand the importance of upholding the Standards as each of our responsibility to promote and ethical and compliant workplace.

After you have finished reviewing the Standards, if you have any questions please reach out to one of the numerous resources available to support you:

- Your manager;
- The Integrity Line (866) 264-6121; or
- The Integrity Line portal
  - Submit an Inquiry
  - Report a Concern;
- [compliance@multicare.org](mailto:compliance@multicare.org); or
- A Corporate Compliance, Privacy, and Civil Rights team member

It is also critical to remind you, that as a MultiCare employee, you have a responsibility to report potential violations of our Standards through one of the above resources. All reports are taken seriously and retaliation for reporting in good faith is prohibited.

Thank you for being a part of MultiCare's Compliance & Ethics Program.



# Acknowledgement and Confidentiality Statement

## Acknowledgement

- I have received MultiCare's Compliance & Ethics training and have access to a copy of the Standards for Business Conduct (the Standards).
- I have read the Standards and understand its purpose and how it applies to me.
- I understand that I am responsible for complying with the Standards.
- I know where to turn if I have questions about the Standards.
- I understand that adherence to MultiCare's policies and procedures is a condition of employment and that MultiCare may take corrective actions, including termination for violations of the policies and procedures, including but not limited to:
  - The Standards
  - MultiCare policies
  - Failure to report instances of non-compliance
  - Applicable laws and regulations
  - Terms and guidelines of government health care contracts
- I have a responsibility to discuss the importance of the Standards with workforce members I supervise, as applicable.
- I acknowledge that I have access to policies via Point MultiCare and understand that I am responsible for reading and abiding by the policies and procedures posted there as amended from time to time.
- I understand and acknowledge that MultiCare has the right to monitor my access and usage of company assets and systems, including internet access, email transmissions and medical record access. I also acknowledge and understand that my access or usage is at MultiCare's discretion and may be revoked at any time.
- I understand that I have a responsibility to report suspected or observed misconduct or other ethical concerns as a condition of my employment. Reports can be directed to my manager or the Integrity Line.

## Confidentiality Statement

I recognize that during my employment or engagement at MultiCare, its affiliates and/or subsidiaries, I may have access to confidential, proprietary, private and/or nonpublic information (confidential information). Confidential information includes, but is not limited to: medical, health, and financial information about customers and their dependents; information that isn't publicly available about MultiCare's operations, associates, plans, development, purchasing and marketing, sales, provider contracts and costs, pricing, improvements, ideas; personnel records, including salaries and benefits, and information about customers and clients. This definition of confidential information is not intended to prohibit workforce from discussing and sharing information about their own salary, benefits, medical information or other personnel matters with each other or outside entities as protected by the National Labor Relations Act.

I understand that I am to protect the confidential information that I have access to or am in possession of, both inside and outside of the physical locations of MultiCare. I will not directly or indirectly use or disclose confidential information unless permitted under MultiCare policy or written authorization.

I agree that all MultiCare records, data, and documents (in any form) are the exclusive property of MultiCare and I agree that at the termination of my employment, I will return the company all MultiCare property, including all manuals, letters, notes, notebooks, reports, customer or prospect lists, employee lists, data, information or files that were in my possession or control during the term of my employment.

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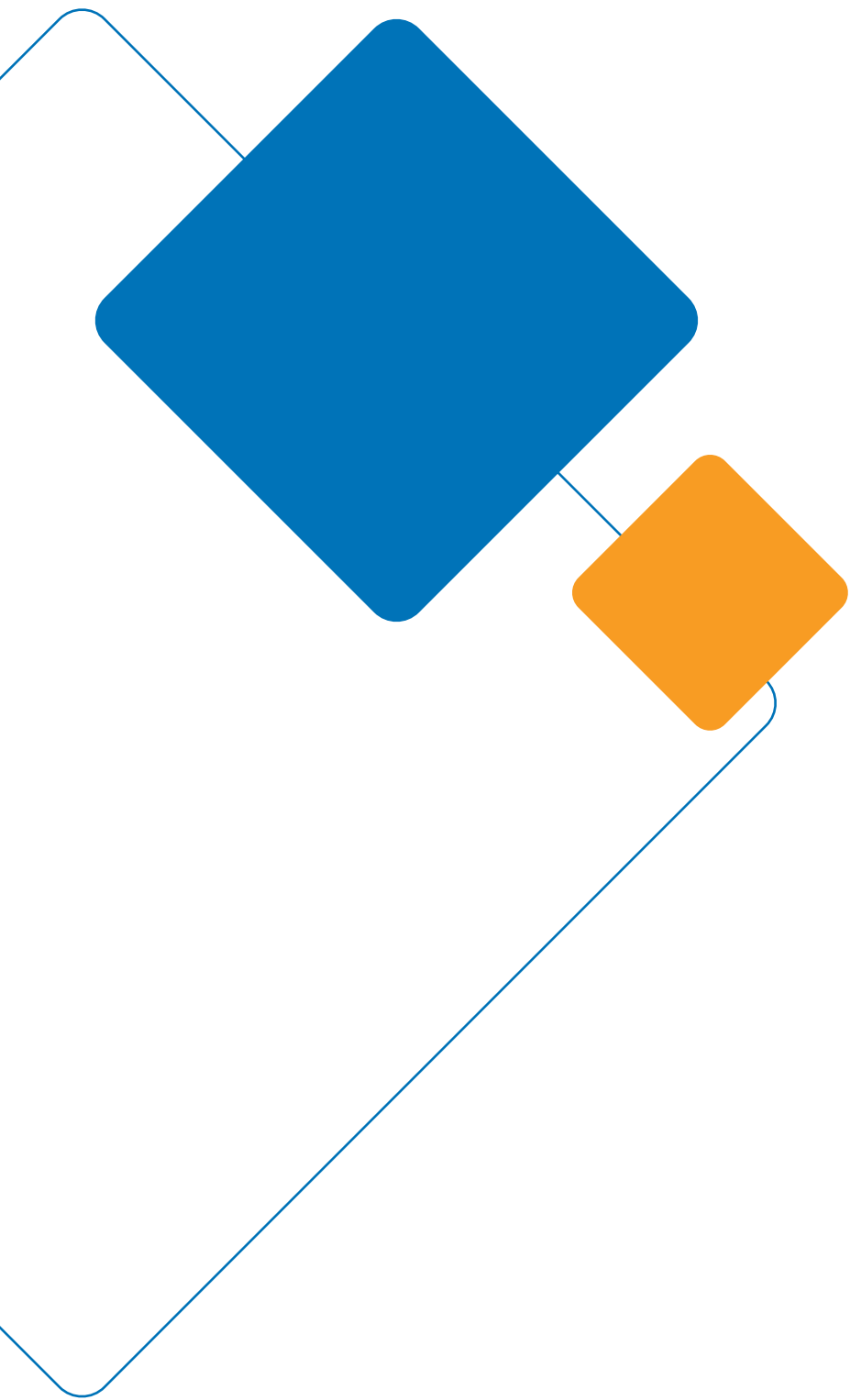
SIGNATURE

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PRINT NAME

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DATE



**MultiCare** 