

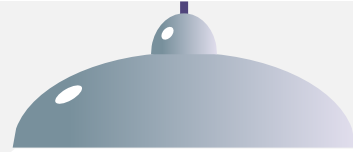
Corporate Responsibility

Learning Objectives



- Introduction to CommonSpirit Health (CS) Corporate Responsibility
- Understand your individual responsibility to support a compliant and ethical culture

What is the Corporate Responsibility Program (CRP)?



Provides resources for making ethical decisions based on our values and standards of conduct

Helps you to understand and comply with complex laws and regulations

Supports you in making the right decision and getting answers to your questions or concerns

Provides a simple reporting process that you can use to make the right decisions and to support others in doing the same

Standards of Conduct: Our Values in Action Policy and Reference Guide AKA *Reference Guide*

- Provides guidance on important topics such as:
 - Regulatory compliance
 - Workplace conduct and integrity
 - Confidentiality
 - Record keeping
 - Conflicts of interest
 - Protection of assets
 - How to report concerns

...helps each of us do things in the right way.



Our Values in Action Policy and Reference Guide AKA Reference Guide can be requested from Department Leader/Supervisor

Standards of Conduct



Demonstrate fairness, honesty and integrity in all interactions in support of our mission.

Ask yourself: Am I always honest and fair in my interactions with people in my care, fellow students and business partners?

Standards of Conduct (cont.)



Uphold a high standard of skill and knowledge to deliver exceptional quality care, service and outcomes.

Ask yourself: Do I keep up with my continuing education obligations? Have I reviewed all the latest safety regulations?

Standards of Conduct (cont.)



Abide by the laws, regulations and policies that govern what we do.

Ask yourself: Do I make sure I follow all rules and regulations — even when no one else is around? Do I ask questions or get clarification when I don't understand something?

Standards of Conduct (cont.)



Maintain the integrity and protect the confidentiality of our patient, resident, client, co-workers and organizational information.

Ask yourself: Do I always protect the privacy and confidential information of those in my care and my co-workers? Do I respect their privacy both when I am in clinical rotations and when I am away?

Standards of Conduct (cont.)



Use our resources wisely to protect our assets, reduce our environmental impact and increase our public health footprint.

Ask yourself: Do I manage my time wisely—not just my own but the time of my co-workers?

Do I use resources responsibly when I'm in clinical rotations?

Standards of Conduct (cont.)



Create an environment that promotes community, respects dignity and supports safety and wellbeing.

Ask yourself: Do I avoid gossip about coworkers and the people we serve? Do I report people who violate the confidentiality we promise to coworkers and patients?

Standards of Conduct (cont.)



Properly disclose and manage situations that pose potential or actual conflicts of interest.

Ask yourself: Am I careful not to ask for and accept money or high-value gifts from vendors or companies that we currently do business with or who want our business?

Standards of Conduct (cont.)



Foster a diverse and inclusive work environment in reverence to our co-workers, partners and those we serve.

Ask yourself: Are all of my interactions with coworkers and patients respectful? Do I understand cultural influences in the community that may affect how we provide care?

What is HIPAA?

Health Insurance Portability and Accountability Act of 1996 (HIPAA)

- ◆ Federal law.
- ◆ Applies to Covered Entities such as healthcare organizations and health insurance companies.
- ◆ Composed of the Privacy Rule, Security Rule, Transactions and Code Standards.

Purpose

- ◆ Protect the confidentiality and security of health information as it is accessed, used, disclosed and electronically transmitted

Report privacy concerns that you see or a patient or family member bring to your manager, your Region Privacy Officer, the CSH Privacy Office at PrivacyOffice@commonspirit.org, or if you wish to remain anonymous, via our Compliance Hotline

Key components of HIPAA include:

- ◆ Acceptable access use and disclosure of protected health information.
- ◆ Implementing physical and technical safeguards to protect PHI
- ◆ Notice of Privacy Practices
- ◆ Patient rights with regard to their health information.
- ◆ Regular Privacy and Security training and sanctions for non-compliance.
- ◆ Privacy Officer to oversee the program, provide guidance and manage privacy investigations.

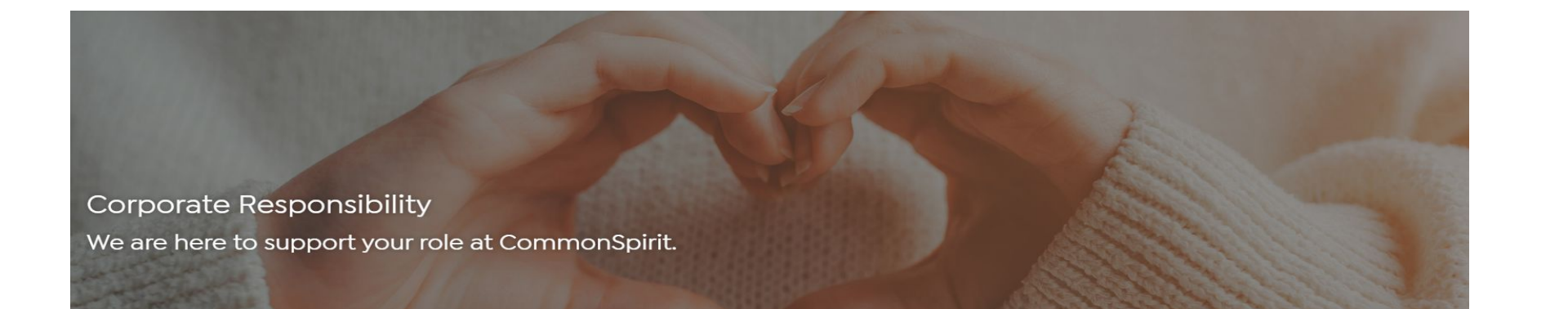
Compliance Reporting



As an organization, and as individuals, we are responsible for promptly reporting potential violations of law, regulation, policy or procedure. You are protected from retaliation if you make a good-faith report, complaint or inquiry.

How to Report a Concern

- Speak with the department manager or another manager.
- If the department manager is not available, you are not comfortable speaking with them, or you believe the matter has not been adequately resolved, contact your HR representative or local Corporate Responsibility Officer (CRO).
- If you want to report a concern to a neutral third party 24 hours a day, seven days a week, you have two options:
 - **1-800-845-4310**
 - File your report at <https://compliancehotline.commonspirit.org>
- You may remain and communicate anonymously if you wish. Deciding to NOT take action may result in serious consequences.



Corporate Responsibility

We are here to support your role at CommonSpirit.

In this module you:

- Learned about the Corporate Responsibility Program (CRP), the Standards of Conduct and the Standards of Conduct Our Values In Action Reference Guide and how they support our mission, vision and values.
- Learned about HIPAA and the key components that are included in HIPAA.
- Identified how to report issues that may violate our Standards of Conduct.