

Introducing your...

CODE OF CONDUCT

10/10/14

Before you begin

LEARNING OBJECTIVE

1 of 53

Upon completion of this course, you will be able to find the Code of Conduct, list some important topics that it covers, and apply it as you do your work.

Welcome to the Code of Conduct online course.



Three **Action** items:

Take Action



Later in this course you'll be asked to take three actions:

1. Report any personal activities that could be a potential conflict of interest (if any)
2. Report any compliance concerns you have (if any)
3. Affirm your commitment to the Code of Conduct

Note: Slide "2 of 53" is not included in the PDF version of the course since it relates only to navigating in the online version of the course.

Welcome to Code of Conduct



Mary Brainerd

President and CEO
HealthPartners

MISSION

VISION

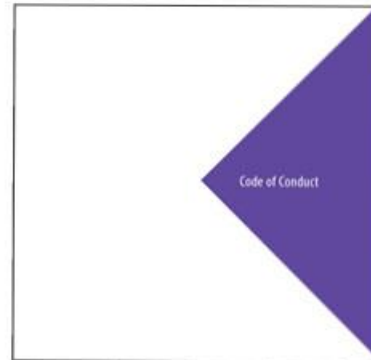
VALUES

Narration

Hi. I'm Mary Brainerd. I'm excited and proud to introduce you to your Code of Conduct. It is an important guide to how we do our work, and helps us all bring our Mission to life, achieve our Vision and show our Values in what we do -- every day.

About the Code of Conduct

1. Where to find it
2. What's in it
3. How and when to use it



Narration

In this course we'll cover some important information about your Code of Conduct. You'll learn where to find it and what's in it. You'll also learn about some basic rules for doing your work while following the law. And you'll see how important it is to use the Code of Conduct and other important resources to make good decisions.

About the Code of Conduct



Who Needs to Know? All Colleagues!

Employees and team members

- including physicians, dentists and other caregivers

Officers and leaders

Board members

Residents, fellows and students/interns

Volunteers

Temporary staff

Consultants and contractors

Narration

Every employer in the HealthPartners system has adopted a Code of Conduct. Each Code of Conduct sets basic expectations for all colleagues – no matter where they work or what kind of work they do. This helps us make sure that our patients and members, their families and all colleagues will have the best possible experience with our care and service – and in all of our workplaces. Most of all, it helps us earn the trust of the people that we serve.

It's accessible... and sustainable

- ▶ Easy to find – just jump online!

[It's on Facets](#) (Park Nicollet)

[It's on myPartner](#) (everyone else)

- ▶ Easy to use.
- ▶ Downloadable to your computer, tablet or phone.

Narration

Because your Code of Conduct is such an important tool – and such a vital reflection of who we are – we make it easy to get and easy to use. It's in an electronic format that you can keep on your computer or even on your smartphone or tablet.

It's accessible... and sustainable

- ▶ Decision tools
 - ▶ Definitions
 - ▶ A guide to resources at your location
- ...and more

Narration

Your Code of Conduct has great features, like searchable content, decision tools and definitions of important terms. Our commitment to sustainability is part of why we put your Code of Conduct online. But for people who are most comfortable with paper, we're giving everyone a handy brochure that includes information about where to find the Code of Conduct, what's in it and important contact information.

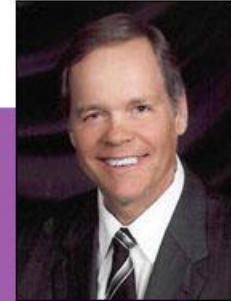
Now this sounds familiar...



Narration

It's no coincidence that our Values play an important role in your Code of Conduct. The expectations in the Code of Conduct align with our values of Excellence, Compassion, Partnership and Integrity.

Meet Your Code of Conduct Guides



Narration

I've asked some senior leaders from across the HealthPartners system to help guide you through each section of the Code of Conduct and to highlight key expectations that guide good decision-making. They'll also talk about how these expectations line up with our Values.

EXCELLENCE

Excellence

11 of 53



Kathy Cooney
Executive Vice President &
Chief Administrative Officer
HealthPartners

- Accountability ←
- Accuracy
- Documentation, Coding and Billing
- Health Plan Operations
- Professionalism and Licensure ←
- Policies
- Record-Keeping ←
- Education

Narration

Hi there, I'm Kathy Cooney. Excellence means that as an organization and as individuals, we do our best and always look for ways to improve. Your Code of Conduct addresses many important topics that support our Value of Excellence. I'd like to talk about a few of them -- Following the law, being accountable and keeping good records.

EXCELLENCE MEANS:

12 of 53

FOLLOW THE LAW

- ▶ Know and follow the rules that apply to your work
- ▶ Follow all requirements for your license or other professional qualifications
- ▶ Don't cross professional "boundaries"

Narration

Nearly everything we do in health care is regulated by law – usually by many laws. As complicated as this can get, it's important to always obey the law. Make sure you understand – and follow – all the rules that apply to your work. This includes keeping licenses or other professional qualifications current. And never cross important professional or social boundaries with patients, members or their families. If you are unsure about the rules that apply to you and your specific work, talk with your leader.

EXCELLENCE MEANS:
BE ACCOUNTABLE

13 of 53

Use organizational resources to help you make the right decisions.

If you don't understand, ask.

If you violate organizational standards or the law:

- ▶ Discipline can include coaching, warnings, suspension or termination.
- ▶ We report violations of professional standards to professional boards or licensing organizations, and we report suspected crimes to law enforcement.

Narration

We are each responsible for the choices we make in our work. If you violate organizational standards or the law, you'll be held accountable. So start by holding yourself accountable – use the Code of Conduct and other organizational resources to help make the right decisions. **ASK QUESTIONS** when you don't understand something. And make sure you read your Code of Conduct and understand it.

EXCELLENCE MEANS:

14 of 53

BE ACCOUNTABLE

If you're a
leader...

- ▶ Be clear about expectations
- ▶ Model good behavior and good judgment
- ▶ Don't tolerate violations of the law or other inappropriate activities
- ▶ Hold people accountable
- ▶ Be fair and consistent
- ▶ Never retaliate

Narration

If you're a leader, you need to make sure the teams you lead understand their responsibilities - and you need to model appropriate behavior and good judgment. Don't encourage, direct or tolerate violations of the Code of Conduct, other organizational standards or the law. Hold people accountable for behavior and actions – AND do so fairly and consistently. Take the concerns of the people you lead seriously. And never retaliate against anyone for asking a question or reporting a concern in good faith.

EXCELLENCE MEANS:

15 of 53

KEEP GOOD RECORDS

- 
- ▶ Thorough
 - ▶ Accurate
 - ▶ Legible
 - ▶ Timely

Narration

Our records need to support safe care, sound business practices and our legal obligations. That means that every record created – whether electronically or on paper – must be thorough, accurate, legible and timely.

EXCELLENCE MEANS:

16 of 53

KEEP GOOD RECORDS

Keep **records** according to Record Retention requirements – and dispose of records in a confidential way

A record is documented information (in paper or electronic format) that was created or received in connection with the operation of the organization's business (including official decisions, actions, or the delivery of care or other services). Consult your organization's record retention policy for more information.


Narration

It also means that records must be kept for the appropriate length of time, according to the record retention policy. When it is time to dispose of a paper record or document, make sure it is done in a way that protects confidentiality, by using locked shredder bins. Record-keeping may not always feel important, but good record-keeping supports excellence in everything else we do.

COMPASSION

18 of 53

COMPASSION



David S. Gesko, DDS
Senior Vice President and
Dental Director
HealthPartners

- Controlled Substances ←
- Information Security
- Patient and Member Rights
- Privacy ←
- Referrals of Care and Service

Narration

I'm David Gesko. We live the Value of Compassion when we show empathy and respect for each person that we care for, serve and work with. We show compassion in many ways, including some specific ways that are covered in your Code of Conduct. I'll highlight a couple of them – managing medications and protecting information.

COMPASSION MEANS:

19 of 53

PROPERLY MANAGING MEDICATIONS

Handle and
track all
medications
carefully



Monitor
prescribing
patterns

Narration

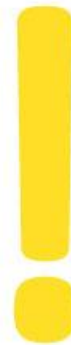
The misuse of medications, including controlled substances, or narcotics, can have devastating effects on patients, members, their families, our colleagues, the community and our organization. If you work in a care delivery or materials management setting, follow all procedures for properly handling narcotics and detecting drug diversion. If you work in a health plan setting, use and follow the systems we have in place to monitor prescribing patterns and fraudulent prescriptions.

COMPASSION MEANS:

20 of 53

PROPERLY MANAGING MEDICATIONS

- ▶ Know the signs of
 - abuse
 - addiction
 - drug diversion
- ▶ Report suspicions immediately



Narration

Know the signs of suspected abuse, addiction and drug diversion – and report concerns immediately. If you see signs of abuse, addiction or colleagues working under the influence, tell your leader or HR. These people may need help, and are putting their colleagues and the people they care for and serve at risk. If you think a colleague is diverting or stealing medications, tell your safety and security team or the Integrity and Compliance team – immediately.

COMPASSION MEANS:

21 of 53

PROPERLY MANAGING MEDICATIONS

▶ Drug diversion is theft

Drug diversion is when someone steals or tries to steal drugs intended for patient care. A “diverter” might be a caregiver or other colleague, a patient, visitor or member of the public.

Narration

Drug diversion is theft, and we respond to it as we would to any crime – by investigating and reporting it to the authorities, including law enforcement and professional licensing boards.

COMPASSION MEANS:

22 of 53

PROTECTING INFORMATION

Protect information and respect privacy.

It's about **trust**.



Narration

When you protect private information, you honor – and earn – the trust that patients and members place in us. You must respect the privacy of the people you care for, serve and work with. Make sure you access, use and share protected information only as allowed by the organization's privacy and data security policies. This responsibility is so important that it continues even if your affiliation with our organization has ended.

COMPASSION MEANS:

23 of 53

PROTECTING INFORMATION

- ▶ Limit your access and use to what you need for your work
- ▶ Follow privacy and security rules
- ▶ Never gossip or snoop

Narration

Don't look up or use anyone's personal information, except of course when you need it to provide care and service. Follow our data security rules to make sure you don't lose information or allow unauthorized people to get access to it. It should be obvious, but it's worth repeating: Never gossip about or disparage our patients or members – even with your coworkers. And don't snoop in anyone's records. It's disrespectful – and illegal.

PARTNERSHIP

25 of 53

PARTNERSHIP



Jeffrey Robertson
CEO/ Administrator
Lakeview Health System

Safe and Healthy Workplace ←

Colleagues' Information

Environmental Stewardship

Fundraising and Community Support ←

Recruiting and Compensation

Research and Funding

Narration

Hello. I'm Jeff Robertson. We are strongest when we work with each other – and with the people we serve. The Code of Conduct covers several important topics that help Partnership thrive. I'm going to highlight some standards that help us create safe and healthy workplaces. But first let's talk about some expectations that help us be such a good community partner.

PARTNERSHIP MEANS:

SUPPORTING OUR COMMUNITY WISELY

26 of 53

Our Mission:
To improve health and well-being in partnership with our members, patients and community

- ▶ Be ethical
- ▶ Be smart
- ▶ Follow the law

Narration

We form strong partnerships with our community – it's part of our Mission. This often involves giving care and service to people who can't afford it; participating in community-building activities; and raising money to support treatment, education, research and other important community needs. But we have to make sure we do this ethically, wisely and according to the law.

PARTNERSHIP MEANS:

27 of 53

SUPPORTING OUR COMMUNITY WISELY

- ▶ Follow organizational policies and procedures
- ▶ Keep good records
- ▶ Make sure all charitable and fundraising activities are authorized

Narration

When you provide charitable care or do fundraising or community benefit work for the organization, make sure that you follow important requirements about eligibility, reporting and record-keeping. You may use our organization's name as an event sponsor or to ask for contributions **ONLY** if it meets our fundraising standards and only if it's authorized by an officer of our organization.

PARTNERSHIP MEANS:
SUPPORTING OUR COMMUNITY WISELY

28 of 53

Follow your
interests
and pursue
your
passions

But remember...

Narration

We hope you will lend your skills and passions to causes that you care about. Just make sure that you follow the organization's guidelines for community involvement and charitable work.

PARTNERSHIP MEANS:

29 of 53

SUPPORTING OUR COMMUNITY WISELY

- ▶ Keep your personal activities separate from your work
- ▶ Don't use company resources for personal activities
- ▶ Never use information from work to support your personal activities

Narration

Keep your personal activities separate from your work. Don't use company resources for personal activities, and don't use your position or anything you learn as part of your work to ask for support from patients, members, research participants or customers. Likewise, never use information about patients, members, research subjects or colleagues for your personal interests.

PARTNERSHIP MEANS:

30 of 53

A SAFE AND HEALTHY WORKPLACE

We are
committed
to...

- ▶ Health and safety practices
- ▶ Equal opportunity, diversity and inclusion
- ▶ A harassment-free work environment
- ▶ Protecting against workplace violence

Narration

We want all people in our facilities to be safe and healthy. When we feel safe and respected at work, and are supported in healthy activities, we know that helps create great experiences for those we serve.

PARTNERSHIP MEANS:

31 of 53

SAFE AND HEALTHY WORKPLACE

- ▶ Don't smoke or use tobacco related products in your workplace
- ▶ Don't use alcohol or illegal drugs while working or on call

Tobacco related products include cigarettes, electric or "e-cigarettes," cigars, pipe tobacco and chewing tobacco.

Narration

Don't smoke or use tobacco in any of our facilities. Don't drink alcohol or use illegal drugs immediately before or during work or when on call. Keep your place of work safe and healthy.

INTEGRITY

INTEGRITY



David Abelson, MD

Senior Executive Vice President
CEO, Park Nicollet

- Business Confidentiality
- Conflicts of Interest ←
- Contracting
- Fair Competition
- Fraud, Waste and Abuse
- Gifts and Entertainment ←
- Government Relations
- Integrity and Compliance Program
- Non-Retaliation
- Outside Employment and Consulting
- Communication ←
- Political Activities
- Reporting Concerns
- Nonprofit Status
- Truthfulness and Cooperation


Narration

Hi, I'm David Abelson. So much of your Code of Conduct is really about being open and honest, and keeping our commitments -- that's the heart of the Value of Integrity. I'm going to highlight a few parts of the Code of Conduct that show how important it is to act with integrity in our business and personal relationships and communications.

INTEGRITY MEANS:

34 of 53

AVOIDING IMPROPER INFLUENCE



**Our work decisions
and actions can't
be motivated by
personal gain**

Narration

To give our best to the people we serve and to each other, work decisions need to be free from inappropriate influence. Avoid any relationship or situation that could cause our patients, members or others to question whether we're acting in their best interests — OR to wonder if we're motivated by personal gain.

INTEGRITY MEANS:

35 of 53

AVOIDING IMPROPER INFLUENCE



Never Accept

- ▶ Cash or gift cards from anyone we do business with
 - including patients and members
- ▶ Anything meant mainly for your personal use
 - no matter its value
- ▶ Any gift, meal or other item from a drug or device company or from any vendor we use for patient care or service
- ▶ Tickets to sporting, entertainment or leisure events
- ▶ Any activity or relationship that could
 - compromise your independent judgment
 - interfere with your professional duties

Narration

Don't accept any gift, meal or anything else, of any value, from a vendor we use for patient or member care or service. Don't participate in sports or entertainment activities sponsored or paid for by someone we do business with. There are some exceptions that are allowed, but they are very limited - and always require your leader's prior approval.

INTEGRITY MEANS:

36 of 53

AVOIDING IMPROPER INFLUENCE

**Respect other organizations'
gift, meal and entertainment
policies**

Narration

Also, don't try to gain any improper business advantage by offering gifts, entertainment or other inducements to vendors, business customers, patients or members, or government officials. When you represent our organization, make sure that you respect other organizations' gift, meal and entertainment policies too.

INTEGRITY MEANS:

37 of 53

AVOIDING IMPROPER INFLUENCE

Make decisions that are...

in the best interests of the organization and the people we serve.

Avoid personal relationships that...

could interfere, or appear to interfere, with your ability to do your work objectively and with independent judgment.

Disclose outside interests...

that involve health care, our competitors or our suppliers to the organization.

Consider your family members' interests...

and treat them as your own. Disclose anything that could create a conflict of interest to the organization.

If an outside arrangement is approved...

follow any management plan your leader puts in place, and then disclose any material changes to your leader.

Narration

We all have lives and interests outside our work. We just need to make sure that those outside activities don't conflict or interfere with our work obligations. Please roll your cursor over each green box to learn more about avoiding potential conflicts of interest.

Take Action



Disclose Conflicts of Interest

(Even if you've previously reported them)

Do you have any outside interests or relationships that could create a conflict or potential **conflict of interest** with your work for the organization?

A conflict of interest occurs when your personal activities and relationships interfere with or appear to interfere with your ability to perform your work objectively and in the best interests of the organization and the people we serve. The standard for determining whether a conflict of interest exists is not whether you think it is a conflict of interest, but whether another, reasonable and objective person would consider it a conflict.

If you have a conflict of interest to report, please complete this form and send it to Integrity and Compliance at intra-company mail stop 21103K.

☐ I have a conflict of interest to report.

Name: _____

Department: _____

Mail stop: _____

Email address: _____

The Office of Integrity and Compliance will contact you for more information.

INTEGRITY MEANS:

39 of 53

COMMUNICATE WISELY



Social Media

- ▶ Follow rules when communicating publicly or privately about work
- ▶ Don't post anything that could be considered unlawful, profane, discriminatory, threatening or hateful

Narration

In this age of social media – with so many ways to communicate – it is more important than ever that we communicate with integrity. Make sure you follow these simple – but important – rules about communicating publicly and privately about your work. Whether you communicate in person, in writing, online, through social media, at a conference or in any other setting or format, do not make statements or use materials that could be considered unlawful, profane, discriminatory, threatening or hateful to another person or organization.

INTEGRITY MEANS:

40 of 53

COMMUNICATE WISELY



**Social
Media**

- ▶ Follow our policies on privacy, business confidentiality, social media, email, Internet use and conflicts of interest

Narration

And always follow our policies on privacy, business confidentiality, social media, email and Internet use and conflicts of interest.

INTEGRITY MEANS:

41 of 53

COMMUNICATE WISELY

Is it work
or is it
personal?

- ▶ Be clear about when you are communicating on behalf of the organization or as an individual
- ▶ Let our Communications team know immediately if the media contacts you about our work

Narration

Always be clear in any public communications about whether you're speaking for the organization or as an individual – and you may only speak on behalf of the organization if you're authorized to do that as part of your job. If the media contacts you about the organization or your work, let our Communications team know immediately.

INTEGRITY MEANS:

42 of 53

OUR INTEGRITY AND COMPLIANCE PROGRAM



Tobi Tanzer

Vice President of Integrity
and Compliance,
Chief Compliance Officer
and Privacy Officer
HealthPartners

- ▶ Prevent
- ▶ Detect
- ▶ Correct

Narration

I'm Tobi Tanzer. The Integrity and Compliance Program is an important resource for our organization – and for you. It helps us prevent, detect and correct violations of legal, professional and ethical standards. It also gives you a place to go if you have questions or concerns, and it protects you when you bring up a concern in good faith.

INTEGRITY MEANS:

43 of 53

OUR INTEGRITY AND COMPLIANCE PROGRAM

Proper Oversight and
Delegation...

Make sure that the right people in the organization are informed about, and accountable for, the Integrity and Compliance Program.

Written Standards of
Conduct...

such as your Code of Conduct, establish clear standards for how each of us is expected to act.

Education, Training
and Awareness...

help explain what is expected under your Code of Conduct and other organizational standards.

Reporting and
Communication
Channels...

allow everyone to ask questions and voice good-faith concerns without fear of retaliation. This includes our Integrity and Compliance Hotline that offers the option of anonymous reporting.

Read this page and the next page to learn more about each element of our Integrity and Compliance Program.

INTEGRITY MEANS:

44 of 53

OUR INTEGRITY AND COMPLIANCE PROGRAM

Objective
Investigations...

mean that the organization reviews and takes seriously reported concerns.

Corrective Actions...

are taken to fix concerns that have been identified through reporting channels, self-assessment or other means. This can include discipline.

Self-Assessment...

such as auditing and monitoring, helps us know that we're keeping our commitment to follow the law and other standards.

INTEGRITY MEANS:
OUR INTEGRITY AND COMPLIANCE PROGRAM

45 of 53



Get to
know your
Code of
Conduct



Code of Conduct

Read your
Code of Conduct

Narration

Our Integrity and Compliance program can only be effective if every one of us participates. Here's what you need to do: Read and understand your Code of Conduct and all other standards that relate to your work.

INTEGRITY MEANS:

46 of 53

OUR INTEGRITY AND COMPLIANCE PROGRAM

- ▶ Complete assigned trainings
- ▶ Disclose potential conflicts of interest
- ▶ Follow the Code of Conduct and other organizational standards—and the law

Narration

Complete your compliance-related trainings, disclosures and certifications on time. These show your commitment to the Integrity and Compliance Program – and they're important for maintaining your good standing with the organization.

INTEGRITY MEANS:

OUR INTEGRITY AND COMPLIANCE PROGRAM

47 of 53

?

Ask questions

?

Report concerns

?

Report your concerns immediately:

- ▶ Your leader or your leader's leader
- ▶ The Integrity and Compliance team

The Hotlines:

- HealthPartners Integrity and Compliance Hotline 1-866-444-3493
- Park Nicollet Hotline 1-855-246-7647

You can make your report anonymously

Narration

Speak up right away when you have a question or concern about a business practice or other relationship that you think may be illegal or improper. Do this before a situation becomes a violation of the law or places the organization or the people we serve at risk. Don't wait! It's your responsibility. You can report your concerns to your leader or your leader's leader. Or you can call or email any member of the Integrity and Compliance team directly. And if you call one of our compliance hotlines – you can even make your report anonymously.

INTEGRITY MEANS:

48 of 53

OUR INTEGRITY AND COMPLIANCE PROGRAM

What
happens
when you
report a
concern?

- ▶ We investigate
- ▶ We fix problems when we find them
- ▶ We don't allow retaliation

Narration

We review all reported concerns, and we conduct thorough and objective investigations. We fix problems quickly. And when a report is made honestly and in good faith, we prohibit any retaliation.

If you have any concerns about possible violations of the Code of Conduct, other organizational standards or the law, let us know about it. And here's an easy way to do that right now.

49 of 53



If you have a concern to report (that has not already been addressed):

- Send an email to integrityandcompliance@healthpartners.com
- or
- Call one of our hotlines:
Park Nicollet colleagues: 1-855-246-7647
All other colleagues: 1-866-444-3493

But wait — there's more!



Mary Brainerd

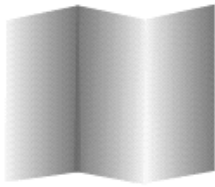
President and CEO
HealthPartners

- ▶ Basic expectations
- ▶ What's the right thing to do?

Narration

This is Mary Brainerd again. The Code of Conduct covers a lot of other important information. But most importantly, the Code of Conduct lets you know the basic expectations for all of us – and it helps us to stop and think: What is the right thing to do?

But wait — there's more!



Look in your brochure



Download your
Code of Conduct

Where to find Code of Conduct:

[It's on Facets](#) (Park Nicollet)

[It's on myPartner](#) (everyone else)



Read it —
and ask questions

Narration

It's important to read your Code of Conduct and understand it — and ask questions if you don't. If you don't know what to do in a situation, ask a question. There are lots of resources to help, including your work area's policies and procedures, your leadership and Human Resources team and our Integrity and Compliance team. You'll find this information — including information about how to download your Code of Conduct to your computer, tablet or phone — in the Code of Conduct brochure you recently received.

Narration

Please take a moment now to show your commitment to doing the right thing. Complete this page to acknowledge the information you received today and confirm your commitment to your Code of Conduct. You will be asked to refresh your commitment every year.

52 of 53

Take Action	Show your commitment (Almost Done)
	<p>▶ I know where to find my Code of Conduct.</p>
	<p>▶ I will act according to the Code of Conduct.</p>
	<p>▶ I will immediately report any concerns and ask questions about activities that I think may violate my Code of Conduct.</p>
	<p>Print name: _____</p> <p>Signature: _____</p> <p>Date: _____</p>

Mail this completed form to Integrity and Compliance at mail stop 21103K

IMPORTANT: In order to get credit for taking this course, you must complete this form and send it to the Integrity and Compliance department.

53 of 53

Thank you!

Congratulations, you have completed this course.

Remember to mail your "Show your commitment" page to Integrity and Compliance at 21103K. And if you completed the Conflict of Interest page, also mail that to 21103K.

Code of Conduct

© 2014, HealthPartners. All rights reserved. Disclosure, use or reproduction without the written authorization of HealthPartners is prohibited. This unpublished work by HealthPartners is protected by the laws of the United States and other countries.

Narration

Thank you for helping to live our Mission, achieve our Vision and show our Values. I appreciate the time you took today – and the work you do every day – to do the right thing.