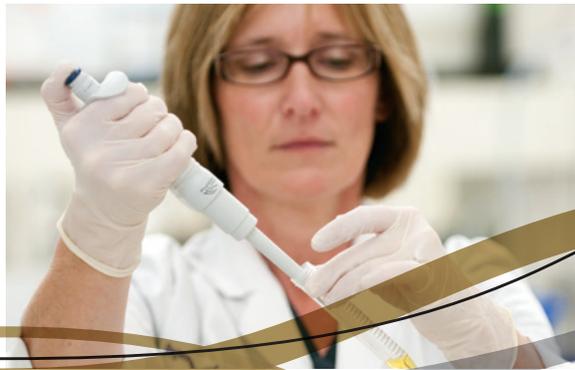


Code of Conduct



A Mission to Care. A Mission to Cure.

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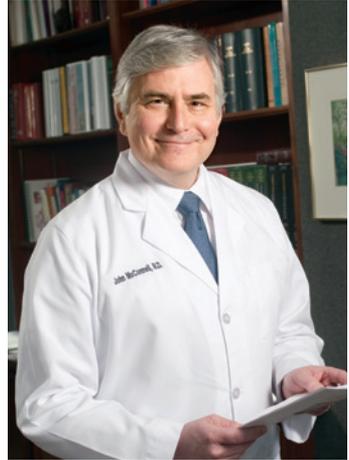
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A MESSAGE FROM JOHN D. MCCONNELL, MD

Wake Forest Baptist Medical Center has a long standing reputation for ethical and lawful behavior, a reputation the staff and faculty continue to earn. This point is more than a source of pride; it is one of our greatest assets. In this increasingly complex environment, we will maintain our leadership in patient care, medical education and research only if we continue to earn the trust of our community.



We believe that our staff and faculty are partners in maintaining an organization that strives to adhere to the highest ethical and legal standards, and we expect everyone to act with integrity in any job or endeavor undertaken on behalf of the medical center. Our Code of Conduct supports staff and faculty in their efforts to follow the complex rules, regulations and guidelines that govern our industry. Leadership is expected to maintain open lines of communication with staff and faculty and to be responsive to their concerns about actual or potential Code of Conduct violations.

This Code applies to all members of our academic medical center, including staff, faculty, vendors and volunteers. Each of us has an obligation to understand the guidelines contained in the Code as well as the values on which they are based. To report or seek guidance on a compliance issue, please follow the guidelines outlined in this Code.

It's important to remember that we are an academic health system made up of many parts, all working together, to improve the health of our region, state and nation. Join me in being an active participant in our transformational journey to become a preeminent, internationally recognized academic medical center committed to sound ethics with a foundation based on Excellence, Compassion, Service, Integrity, Diversity, Collegiality and Innovation.

A handwritten signature in black ink that reads "John D. McConnell". The signature is fluid and cursive, with the first letters of the first and last names being capitalized and prominent.

John D. McConnell, MD
CEO, Wake Forest Baptist Medical Center

INTRODUCTION



A code of conduct describes standards that guide the behavior of people who make up an organization. Our organization, Wake Forest Baptist Medical Center, is comprised of Wake Forest Baptist Health and Wake Forest School of Medicine. The Code of Conduct was designed to support our vision, mission and values. When you are faced with an ethical question or issue, you should consult this Code along with existing policies and procedures for guidance.

The Code of Conduct cannot address every ethical issue that might occur. Employees are encouraged to seek guidance on any ethics or compliance issue by talking with their supervisor or another leader within their department. Steps for addressing suspected or known compliance violations are outlined on page 8.



Vision

Wake Forest Baptist Medical Center is a preeminent, internationally recognized academic medical center of the highest quality, with balanced excellence in patient care, research and education.

Mission

Wake Forest Baptist Medical Center's mission is to improve the health of our region, state and nation by:

- ▶ Generating and translating knowledge to prevent, diagnose and treat disease.
- ▶ Training leaders in health care and biomedical science.
- ▶ Serving as the premier health system in our region, with specific centers of excellence recognized as national and international care destinations.

Values

- ▶ **Excellence**—Demonstrate the highest standards of patient-centered care, education, research and operational effectiveness.
- ▶ **Compassion**—Respond to the physical, emotional, spiritual and intellectual needs of all.
- ▶ **Service**—Cultivate selfless contribution for the greater good.
- ▶ **Integrity**—Demonstrate fairness, honesty, sincerity and accountability.
- ▶ **Diversity**—Honor individuality and protect the dignity of all.
- ▶ **Collegiality**—Foster mutual respect, facilitate professional growth and mentorship, and reward teamwork and collaboration.
- ▶ **Innovation**—Promote creativity to enhance discovery and the application of knowledge.



GUIDING PRINCIPLES

Patient Care

We are committed to providing quality care while respecting the rights of our patients.

- ▶ We make clinical decisions based on patient care needs.
- ▶ We interact with patients and family members in a caring, compassionate manner.
- ▶ We take steps to ensure that each patient understands his or her treatment needs and options.
- ▶ We respect each patient's right to ask about any aspect of his or her care.
- ▶ We do not discriminate against any person because of age, race, religion, gender, sexual orientation, disability, national origin, ability to pay, or for any other reason prohibited by regulation or law.
- ▶ We encourage patients to comment on their satisfaction or concerns about the care they receive.

Health and Safety

We are committed to maintaining a work environment that complies with all applicable health and safety laws.

- ▶ We handle all equipment, supplies and waste using proper equipment and techniques.
- ▶ We perform our duties free from the influence of alcohol, illegal drugs and improperly used medications.
- ▶ We provide and require the use of protective equipment and measures.
- ▶ We respond to reports of unsafe practices.
- ▶ We do not allow others to use our access privileges to secure locations.

Environment

We are committed to being an environmentally responsible institution.

- ▶ We comply with all environmental laws and regulations.
- ▶ We encourage recycling, and we seek new methods to reduce by-products and wastes that have a negative environmental impact.
- ▶ We dispose of all medical waste and other hazardous materials in accordance with applicable laws and regulations.

Research

We require all research to be conducted within legal and ethical standards.

- ▶ We are honest and accurate in our research applications.
- ▶ We use research funds for the appropriate purpose.
- ▶ We respect the right of individuals to refuse to participate in clinical studies without compromising their care.
- ▶ We conduct clinical trials and studies in accordance with requirements of the appropriate regulatory bodies.
- ▶ We follow all laws, policies and procedures relating to the care, transport and use of animal subjects in research.

Respect

We are committed to maintaining a work and educational environment in which we treat each other fairly and respectfully.

- ▶ We do not tolerate threats, discrimination, harassment, retaliation, intimidation or other disruptive behaviors.
- ▶ We report threats, discrimination, harassment, intimidation or other disruptive behaviors, regardless of the position of authority of the person(s) involved.

Conflicts of Interest

We avoid conflicts of interest in which a faculty or staff member's personal interest may compromise his or her judgment in work-related matters.

We recognize that even the appearance of a conflict of interest must be avoided.

- ▶ We disclose conflicts of interest and do not take part in making any decision affected by these conflicts.
- ▶ We do not permit a faculty or staff member to have influence over the conditions of employment of an immediate family member.
- ▶ We ensure that any secondary employment does not interfere with our job performance.
- ▶ We do not accept personal gifts of any kind from vendors.
- ▶ We do not accept gifts of more than nominal value from patients or patient family members.
- ▶ We do not pay for, or receive payment for, patient admissions or referrals for service.

GUIDING PRINCIPLES

Wake Forest Baptist Medical Center Resources

We protect Wake Forest Baptist Medical Center resources and intellectual property.

- ▶ We understand that the products and systems developed at work are the property of Wake Forest Baptist Medical Center.
- ▶ We do not use assets that belong to Wake Forest Baptist Medical Center for personal gain.
- ▶ We use electronic resources with good judgment and do not allow occasional personal use to interfere with work responsibilities.
- ▶ We respect patents and other forms of intellectual property.

Political Activity

We are not engaged in political activities as an organization, nor do we use Wake Forest Baptist Medical Center resources for these activities.

- ▶ We do not direct faculty or staff members to make political contributions or to support any political party or candidate.
- ▶ We respect the right of each staff and faculty member to participate in, or refrain from participating in, political activities.

Confidential Information

We protect confidential information related to our patients, donors, faculty, staff, research and Wake Forest Baptist Medical Center.

- ▶ We do not access confidential information without a work-related need to know, and we do not disclose confidential information to others who are not the authorized recipient or do not have a work-related need to know.
- ▶ We do not disclose confidential business information concerning Wake Forest Baptist Medical Center without the proper authorization or a specific legal requirement.
- ▶ We do not use information obtained from Wake Forest Baptist Medical Center for our personal financial gain, nor disclose it to others for their gain.
- ▶ We do not share passwords or send unsecured email.
- ▶ We properly shred and dispose of confidential information.
- ▶ We protect identifying information to reduce the threat of identity theft for our patients, faculty, staff, vendors and others.

Medical Billing and Records

Our billing processes are established to ensure the accuracy of claims submitted for payment.

- ▶ We accurately bill for services rendered and supplies utilized.
- ▶ We strive to be accurate and complete in our patient documentation.
- ▶ We do not knowingly submit a false claim for payment. We understand that the federal False Claims Act establishes liability for any person who knowingly submits or causes the submission of a false claim to the government for payment.
- ▶ We report any knowledge of a false claim submission through the established reporting channels.
- ▶ We understand that staff and faculty members are protected from retaliation when they report a false claim to Wake Forest Baptist Medical Center leadership or outside agencies.
- ▶ We refund payments received in error, and we notify the payer of the reason for the refund.

Audits and Investigations

We cooperate fully and professionally with any internal or external audit or investigation.

- ▶ We notify the Compliance Office of all external requests, visits and inquiries from government agencies.
- ▶ We do not provide false or misleading information to auditors.
- ▶ We provide accurate and timely information for audits and investigations.
- ▶ We do not alter or destroy any document or record in anticipation of an audit or investigation.

Educating Students

We maintain a professional environment that supports the development of our students.

- ▶ We comply with all applicable regulations of our accredited teaching programs.
- ▶ We strive to be fair and impartial in student grading, evaluations, promotions and grievances.
- ▶ We comply with all statutes and regulations that protect the privacy of our students' education records.

Resolving Compliance Issues

Staff and faculty are required to report any known or suspected violations of laws or of Wake Forest Baptist Medical Center policies or regulations. This may involve situations in which you observe a violation, hear about a violation or suspect that a violation may have occurred. If you observe improper behavior by anyone in the workplace, regardless of the individual's position of authority, you are responsible for reporting it immediately.

Step 1

If you are unsure about the legality or appropriateness of an action or proposed action, think of the following:

- ▶ Is it ethical?
- ▶ Is it legal?
- ▶ Is policy being violated?
- ▶ Will it reflect negatively on you or Wake Forest Baptist Medical Center?

You may seek guidance on any ethics or compliance issue by contacting leadership within your department, Human Resources, the Compliance Office or the Compliance Hotline.

Step 2

If you know about or suspect a compliance violation, discuss your concern with your supervisor. If you are not comfortable addressing the topic with your supervisor, seek another leader within your department.

Step 3

If the problem is not resolved or acted upon, contact Human Resources, the Compliance Office or the Compliance Hotline.

Contacting the Compliance Office

Compliance concerns may be addressed in person, by phone, by mail, by e-mail or anonymously through the Compliance Hotline.

Location: Piedmont Plaza II, Suite 307

Phone: 336-713-4949

Email: compliance@wakehealth.edu

Mailing address: Wake Forest Baptist Medical Center Compliance Office
Medical Center Boulevard
Winston-Salem, NC 27157

Contacting Human Resources

Employee concerns related to compliance may be addressed with Human Resources by calling 336-716-6078.

Compliance Hotline

The Compliance Hotline is operated independently by The Network, Inc. and is available to staff and faculty 24 hours a day, seven days a week. Your report can be made anonymously, if you choose. No attempt will be made to determine your identity.

Phone: 1-877-880-7888 (toll-free)

Online: www.tnwinc.com/reportline/international

Reporting Protection

Wake Forest Baptist Medical Center is committed to protecting staff and faculty members who, in good faith (honestly and without malice), report a known or suspected compliance violation.

- ▶ We strive to create an environment where individuals feel comfortable expressing their concerns about compliance issues.
- ▶ Harassment or retaliation in response to reporting compliance concerns is not tolerated and should be reported to the Compliance Office.

Care has been taken to provide the most accurate, up-to-date information in this Code of Conduct. However, our knowledge base can sometimes change more rapidly than we are able to update information. If the information contained within this Code does not agree with policies or procedures in place, the current policies or procedures should govern your actions.

Additional information on the topics covered in this Code of Conduct can be found on the Compliance Office website at: intranet.wakehealth.edu/Departments/Audit-and-Compliance/

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