The Best Version of Ourselves
Living Out Our Code of Conduct
Contents

1 A Message from CEO Julie Freischlag, MD

2 Introduction
   Our Commitment to Professionalism
   Our Patient and Family Promise
   Our Educational Pledge

4 Guiding Principles
   Patient Care
   Research
   Education
   Respect
   Medical Billing and Institutional Records
   Confidential Information
   Conflicts of Interest
   Medical Center Resources
   Audits and Investigations
   Health and Safety
   Political Activity

8 Resolving Compliance Issues
   Resolving Compliance Issues
   Contacting the Audit and Compliance Office
   Compliance Hotline Reporting
   Contacting the HR People Team
   Reporting Protection
One of the greatest assets of Wake Forest Baptist Medical Center is our commitment to the highest standards of ethical and lawful behavior. Our Code of Conduct provides guiding principles to ensure that our interactions and actions reflect the best version of ourselves-professional, honest, respectful and caring behavior.

Health care is an increasingly complex environment that requires us to adhere to the rules, regulations and guidelines that govern our industry. This includes avoiding conflicts of interest, protecting confidential information, conducting our work ethically, reporting compliance concerns and fostering a professional work environment.

Our Code of Conduct applies to all of us—staff, faculty, trainees, students, vendors and volunteers, no matter where in our health system we work. As an academic medical center, we are leaders in patient care, research, education and innovation, all working together to improve health. We rely upon each other to act with professionalism and integrity, and our Code guides our behavior for the good of all.

Julie Freischlag, MD
CEO, Wake Forest Baptist Medical Center
Our Code of Conduct guides the collective behavior of the entire Wake Forest Baptist Health family (Davie Medical Center, High Point Medical Center, Lexington Medical Center, Wake Forest Baptist Medical Center, Wilkes Medical Center, Wake Forest Health Network and other clinical subsidiaries/affiliates), Wake Forest School of Medicine, Wake Forest Innovations and Wake Forest University Health Sciences.

We have a commitment to professionalism at Wake Forest Baptist Medical Center. That commitment involves action—showing mutual respect, honor and integrity; being responsible for our actions; having reverence and compassion for human life; being dedicated to teamwork; making ethical decisions; and working at a level of excellence that results in accountability to individuals and society and creates better patient outcomes and experience.
Our Code of Conduct also stresses the expectation that we follow all laws, regulations and policies that relate to our operations, and provides a way for us to raise compliance concerns and ask questions.

When you are faced with an ethical question or issue, you should consult this code along with existing policies and procedures and seek help from your supervisor or another leader within your department. Steps for addressing suspected or known compliance violations are outlined on page 8.

What is most important to remember? Standing by silently in the face of wrong-doing does not uphold the spirit of our Code of Conduct. We are obligated to report concerns.

**Ask yourself these questions to guide your actions:**

► Could it cause harm?
► Is it ethical?
► Is it legal?
► Is policy being violated?
► Will it reflect negatively on you or Wake Forest Baptist Medical Center?

**Our Patient and Family Promise**

We will:

► Keep you safe.
► Care for you.
► Involve you and your family.
► Respect you and your time.

**Our Educational Pledge**

We will:

► Deliver educational excellence.
► Act with integrity and professionalism.
► Respond with mutual respect for all.
GUIDING PRINCIPLES

Patient Care
We are committed to providing quality care and 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, gender identity or expression, sexual orientation, disability, national origin, ability to pay, or for any other reason prohibited by regulation or law or common decency.
► We encourage patients to comment on their satisfaction or concerns about the care they receive.
► We follow the Emergency Medical Treatment and Active Labor Act (EMTALA) and similar regulations relating to the admission, transfer, and discharge of patients.

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.

Education
We maintain a professional environment that supports the development of our trainees and students.
► We support and nurture the development and wellness of our trainees and students.
► We comply with all applicable laws and regulations of our accredited education programs.
GUIDING PRINCIPLES

► We use the Student Handbook as a guide and resource.
► We are fair and impartial in grading, evaluations, promotions and grievances, and follow our policies and procedures for addressing concerns.
► We comply with all statutes and regulations that protect the privacy of education records.

Respect
We are committed to maintaining a work and educational environment in which we treat each other fairly and respectfully.
► We seek to understand both the similarities and differences of our colleagues and patients.
► 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.
► We use social media and technology responsibly.

Medical Billing and Institutional Records
We follow our established billing practices to ensure the accuracy of claims submitted for payment.
► We make efforts through policies, procedures and actions to prevent, detect and correct fraud, waste and abuse within the health care system.
► We strive to be accurate and complete in our patient documentation.
► We accurately bill for services rendered and supplies utilized.
► 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 fraud, waste, abuse and/or a false claim submission through the established reporting channels.
► We understand that staff, faculty, trainees and students 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.
When we engage in record keeping (including employee time cards, medical records and patient bills) on behalf of Wake Forest Baptist Medical Center, we are accurate and honest.

We follow applicable accounting principles in regards to our financial records.

Confidential Information

We protect confidential information related to our patients, donors, faculty, staff, trainees, students, 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 post confidential information to any social media site.

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, trainees, students, vendors and others.

Conflicts of Interest

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

We disclose potential conflicts of interest and do not take part in making any decision affected by these interests.

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.

Audits and Investigations
We cooperate fully and professionally with any internal or external audit or investigation.
► We notify the Audit and 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.

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.
► We are committed to protecting all persons in our care and on our premises as well as all members of our academic medical center from abuse and neglect, and we will report suspected abuse and neglect immediately.
► We dispose of all medical waste and other hazardous materials in accordance with applicable laws and regulations.
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 to 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.

Staff, faculty, trainees, students, contractors and volunteers are required to report any known or suspected violations of laws and regulations, or of Wake Forest Baptist Medical Center policies. 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 it safe?
► Is policy being violated?
► Will it reflect negatively on you or Wake Forest Baptist Medical Center?
Seek guidance on any ethics or compliance issue by contacting leadership within your department, HR People Team, the Audit and 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 the Audit and Compliance Office, the HR People Team or the Compliance Hotline.

Contacting the Audit and Compliance Office
Compliance concerns may be addressed in person, by phone, by mail, by email or anonymously through the Compliance Hotline.
Location: Piedmont Plaza II
Phone: 336-713-4949
Email: compliance@wakehealth.edu
Mailing address: Wake Forest Baptist Medical Center Compliance Office
Medical Center Boulevard
Winston-Salem, NC 27157
Compliance Hotline

The Compliance Hotline is operated independently by Navex Global and is available to staff, faculty, trainees and students 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

Reports submitted through the Hotline are handled and investigated by the Audit and Compliance Office with assistance from other areas as needed.

Contacting the HR People Team

Employment concerns may be addressed via the PeopleLink by calling 336-716-6464 or submitting a message to the website: Peoplelink. wakehealth.edu.

Reporting Protection

Wake Forest Baptist Medical Center is committed to protecting staff, faculty, trainees and students 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 Audit and Compliance Office.
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.

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.

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.

We have made every effort to update this Code of Conduct. However, emerging new policies may override information provided here. Your actions should always be guided by the most current policies.
Code of Conduct

Updated July 2018

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