LSU HEALTH CARE SERVICES DIVISION
BATON ROUGE, LOUSIANA

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Deputy Chief Executive Officer
LSU Health Care Services Division

4/2/15
Date

LSU HEALTH CARE SERVICES DIVISION
CODE OF CONDUCT POLICY

I. Scope: This policy shall apply to each officer, director, employee, leased employee, student and agent (Personnel) of the HCSD.

II. Purpose: To provide guidance to all Personnel of the HCSD with regard to expected ethical conduct as may be reflected in all decisions made and actions taken in the performance of duties and responsibilities of their jobs.

III. Policy Statement: It is the policy of the LSU Health Care Services Division (HCSD) to adopt a Code of Conduct (**Attachment A**) that will provide guiding standards for the decisions and actions of Personnel of the HCSD. It is further the policy of HCSD to provide a copy of the Code of Conduct to each employee and to obtain a signed acknowledgement of receipt. A copy of the Code of Conduct will also be an attachment to each HCSD personal or professional service contract.

IV. Responsibilities: It shall be the responsibility of the Human Resources Departments at the Central Office and the various hospitals to disseminate the Code of Conduct and obtain and retain acknowledgements from officers, directors, employees, leased employees and students. It shall be the responsibility of the Contracts section of the Purchasing Department to see that a copy of the Code of Conduct is made a part of all personal and professional service contracts. It shall be the responsibility of the Training/Staff Development and the Compliance Departments of the Central Office and the various hospitals to educate Personnel with regard to the Code of Conduct.

V. Procedures: Procedures will be established by the applicable departments as necessary to accomplish the dissemination of and education on the Code of Conduct as noted previously.

1. At a minimum, the dissemination will take place upon the initial issuance and any revision of this policy as well as once every two years following the initial issuance or latest revision.

2. At a minimum, education on the Code of Conduct will occur within three months of initial issuance, be included in the initial orientation for all new staff. The training on the Code will be updated for the latest revisions and will be included in the annual compliance training programs as a refresher.

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The Code of Conduct of the LSU Health Care Services Division (HCSD) provides the guiding standards for our decisions and actions as members of the HCSD. Although the Code can neither cover every situation in the daily conduct of our many varied activities nor substitute for common sense, individual judgment or personal integrity, it is the duty of each officer, director, employee, leased employee, student and agent (Personnel) of the HCSD to adhere, without exception, to the principles set forth herein. All Personnel of the HCSD are subject to and shall comply with the terms of this Code of Conduct.

1. HCSD Shall Comply With All Applicable Laws.

It is the duty of all Personnel of the HCSD to take all reasonable steps to comply with all applicable laws and regulations. This includes, but is not limited to, compliance with the Health Insurance Portability and Accountability Act (HIPAA) pertaining to Privacy and Information Security, as well as, the revisions to the Social Security Act implemented by the Deficit Reduction Act of 2005 pertaining to the detection and prevention of fraud waste and abuse and the rights of employees to be protected as whistleblowers. All Personnel must be aware of the legal requirements and restrictions applicable to their respective positions and duties. The HCSD shall implement programs necessary to further such awareness and to monitor and promote compliance with such laws and regulations. Any questions about the legality or propriety of any proposed actions to be undertaken by or on behalf of the HCSD should be referred immediately to one's supervisor, department manager, Hospital Administrator, Human Resources Director, or LSU HCSD Deputy Chief Executive Officer or LSU HCSD Chief Executive Officer.

2. The HCSD Shall Conduct Its Affairs in Accordance With the Highest Ethical Standards.

The HCSD and all Personnel of the HCSD shall conduct all activities in accordance with the highest ethical standards of the State of Louisiana, the community, and their respective professions, at all times in the manner which upholds the HCSD's reputation and standing.

The HCSD does not pay for patient referrals, nor does it accept payment for any referrals it makes. No inducements shall be made to patients to choose the HCSD to provide healthcare services except for those of nominal value that conform to applicable laws and regulations. Payment or inducements offered for participation in research studies shall be in conformity with applicable laws, regulations, grant requirements and HCSD policy.

All contracts involving the HCSD or its Personnel will be in accordance with the requirements of state and federal laws, including any anti-kickback and self-referral laws. In addition, all contracts will reflect knowledge of the Privacy and Information Security provisions of HIPAA and provisions of the Deficit Reduction Act of 2005 noted previously.

3. All Personnel Shall Avoid Conflicts of Interest

The HCSD is a state owned organization dedicated to the provision of healthcare to the general public and supporting the LSU Health Care Services Division, in its mission of providing health care services, education of health professionals and health-related research. All Personnel of the HCSD must faithfully conduct their duties, in their assigned roles and tasks, for the purpose, benefit and interest of the HSCD and those that it serves. All Personnel have a duty to avoid conflicts of interest with those of the HCSD and may not use their position and affiliation with the HCSD for personal benefit. Personnel must consider and avoid not only actual conflicts but also the appearance of conflicts of interest. Any questions relating to these matters should be directed to your supervisor, department manager, Hospital Administrator, Human Resources Director, LSU HCSD Deputy Chief Executive Officer or LSU HCSD Chief Executive Officer.

No Personnel shall accept gifts or anything of value from any person or company that does business with or uses services of the HCSD. Any arrangement through which Personnel directly or indirectly benefit by receiving anything of value shall be reviewed prior to its implementation.

4. The HCSD Shall Strive to Attain the Highest Standard of Patient Care

As leaders in health care, all Personnel of the HCSD must support the HCSD's mission to provide health services of the highest quality that meet the needs of our patients, their families and the community as a whole. The HCSD will take all reasonable steps to provide treatment in accordance with all pertinent federal and state laws. The care provided must be reasonable and necessary to the care of each patient, as appropriate to the situation, and such care must be provided by properly qualified individuals.

All patient care, and all patient records, must be properly documents as required by law and regulation, payor requirements, applicable contractual obligations, and professional standards. Billing records and the supporting documentation will be accurate, complete and as detailed as required. Records must be accurate as to the service provided, charges, identity of provider, date and place of service, and the identity of the patient.

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The HCSD and all its Personnel must protect the confidentiality of patient information. All patient information (including medical records) must be kept strictly confidential and not released to anyone not associated with the HCSD, or removed from

HCSD facilities without written patient consent, lawful court order, pursuant to exceptions in the law, or in accordance with HCSD policies now in existence or as developed. All Personnel must avoid discussing confidential information with non HCSD Personnel or where others, including family, can overbear them. Internal access to medical records is not appropriate unless there us a legitimate work-related need to see the information.

The HCSD and its Personnel will make every reasonable effort to comply with all applicable laws, regulations and HCSD policies concerning the security and privacy of patient information and particularly electronically stores or transmitted patient information, in accordance with the applicable provision of HIPAA.

5. The HCSD Shall Provide Equal Opportunity and Respect the Dignity of all Patients and Personnel of the HCSD.

The HCSD is committed to providing equal educational and employment opportunities for all persons, without regard to race, color, national or ethnic origin, religion, gender, sexual orientation, disability or veteran's status. The HCSD is committed to providing a patient care and workplace environment that emphasizes the dignity and respect of each individual. And, as a result, any type of prohibited discrimination, in any form or context, will not be tolerated.

6. The HCSD Shall Maintain the Highest Standards of Academic Integrity.

The HCSD, and the Personnel of the division, must uphold the highest moral and ethical standards in education of health professionals and health related research. All Personnel must undertake their academic activities with honesty and integrity and avoid any activities that would be detrimental to the individual, community, or reputation of the HCSD.

Personnel of the HCSD must also uphold the highest ethical standards in research. Activities that interfere with the right of the HCSD's patients, including their right to confidentiality, and activities such as plagiarism or falsification or fabrication of data or results, are intolerable to the HCSD's goals and are strictly forbidden. Research must be conducted only with the applicable approvals required by the policies and procedures of the HCSD and LSU and in accordance with the requirements of granting agencies.

7. The HCSD Shall Maintain Proper and Accurate Records and a Relationship of Integrity With All Payor Sources

The HSCD and its Personnel shall create and keep billing and supporting records and documentation that conform to legal, professional and ethical standards. The HCSD and its Personnel shall ensure that payment or reimbursement from government payors such as Medicare and Medicaid and private payor sources is for such care as is reasonable, medically necessary and appropriate, is provided by properly qualified persons, and is billed in the correct amount and supported by proper documentation.

Bills shall reflect the most appropriate CPT, ICD-9, E&M, APC, and DRG codes as reflected in the documentation of the services rendered, regardless of the impact on reimbursement. Billing will be for only medically necessary services, properly provided, in accordance with the medical necessity rules of the applicable payor. Billing shall reflect compliance with applicable bundling rules.

Any discounts offered to a patient or payor shall be reported as required by law. The HCSD will make a reasonable, good faith effort to collect co-pays and deductibles from its patients. Every reasonable effort will be made to be consistent in dealing with similarly situated individuals. No waivers of co-pays or deductibles shall be allowed unless there is an exception in accordance with federal regulations and HCSD policies. All reasonable steps will be taken to return credit balances in a timely fashion.

The HSCD and its Personnel will accurately respond to all governmental, payor, or patient inquiries as requires by law. Personnel will report all unusual inquiries or requests for documentation to their supervisors in accordance with HCSD policies. Personnel will record any specific advice, guidance, or instructions received from the government or other payors.

8. All Business Practices of the HCSD and its Personnel Shall Be Conducted with Honesty and Integrity.

All business practices of the HCSD must be conducted with honesty and integrity and in a manner that upholds the HCSD's reputation with patients, payors, vendors, competitors and the academic community. All Personnel of the HCSD must maintain and protect the property and assets of the HCSD, including intellectual property and proprietary information, controlled substances and pharmaceuticals, equipment and supplies, and funds of the HCSD.

It is illegal to pay or receive payments for patient referrals or for a recommendation that someone needs healthcare services or items. It is the policy of the HCSD not to pay for referrals or recommendations or to accept payment for referrals made by its Personnel regardless of the payor source. "Payment" does not have to be cash; it can be anything of value, a discount or a free service or piece of equipment.

It is against the law to knowingly submit a false claim for payment. Submitting a false claim includes using the wrong billing codes, falsifying medical records, or billing for services that are not provided or are not medically necessary. Violations of these laws can be punished by fines, prison terms or both. Providers can also be excluded from the Medicare or Medicaid program for submitting false claims. The policy of the HCSD is to bill accurately and only for medically necessary services that have been provided and documented. Any contractors that perform billing services for the HCSD provider must insure compliance with billing requirements as well. Additionally, all teaching physicians who utilize residents shall insure that all bills for services rendered comply with the teaching physician guidelines.

It is generally against the law for a physician to refer patients to providers of services in which the physician has a financial interest or relationship under both state and federal laws. Violation of the federal law can result in fines and exclusion from Medicare or Medicaid. The law in this matter is complex and question should be directed to the appropriate administrative authority or the Compliance Director.

9. The HSCD Shall Have Proper Regard for Health and Safety

The HCSD shall work with all other relevant parties to ensure a workplace that conforms with all laws and regulations regarding occupational health and safety. The HCSD is committed to proper maintenance of the environment, and all medical waste, hazardous waste, and other products shall be used and disposed of in accordance with all applicable environmental laws and regulations.

10. The Code of Conduct is the Fundamental Basis for the Operation and Activities of the HCSD.

- The Code of Conduct exists for the benefit of the HCSD, its Personnel, and all who have contact with the HCSD. The Code must be an integral part of the daily activities of the HCSD and its Personnel.

- The Code of Conduct is in addition to, and does not limit, specific policies and procedures of the HCSD and all Personnel must perform their duties in accordance with such policies and procedures.

- To facilitate daily operations and activities of the HCSD, managers and supervisors shall address disruptive behavior of individuals working as all level of the organization. Disruptive Behavior is behavior which violated accepted rules of civil behavior and professional etiquette, violates legal standards of conduct or professional ethics, and disrupts the efficient and orderly operations of patient care.

- The Code of Conduct is a living document, and all Personnel are encouraged to suggest changes or additions to the Code.

- It is the duty of all Personnel of the HCSD to uphold the standards set forth in the Code of Conduct and to report any known or suspected violations of this Code or the compliance program by following the reporting procedures outlined by the HCSD.

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- Any HCSD Personnel that finds himself/herself under criminal investigation, charged, or convicted for the violation of healthcare compliance laws or the perpetration of a fraud, must report such information to appropriate administrative officials. All Personnel shall also report any exclusions, debarments, suspension or removal from any government program to the compliance director.

- The administrative and medical leadership of the HCSD have a special duty to adhere to the principles set forth in this Code of Conduct, to support other Personnel in their adherence to the Code, to recognize and detect violations of the Code, and to enforce the standards set forth herein.

- Any action taken in reprisal against anyone who reports suspected violations of the Code of Conduct or other HCSD policies and procedures, in good faith, shall be prohibited and dealt with severely. However, deliberate false reporting is also prohibited and will result in disciplinary action.

- Alleged violations of the Code of Conduct or other policies and procedures of the HCSD will be investigated in accordance with established HCSD policies and procedures. Proper and prompt remedial action shall be taken in response to any improper activities revealed by an investigation, including reporting as required by law.

- Disciplinary action for violations of the Code of Conduct and other HCSD policies and procedures shall be enforces through the disciplinary policies and procedures of the HCSD. Disciplinary actions will be determined on a case-by-case basis and may include dismissal from employment. If the HCSD suspects that a violation has included criminal violations of law or regulation, the HCSD will cooperate with law enforcement or regulatory authorities in connection with the investigation and prosecution of the offender.

How to Report a Suspected Violation of the Code

To report a suspected violation of the Code of Conduct, you should report all pertinent information to your immediate supervisor. If you prefer not to report such matters to your supervisor for any reason, you should al or notify your department manager, Hospital Administrator, Human Resources Director, or the Compliance Liaison Officer for your facility:

Corporate Compliance Office	225-354-7032 or 985-878-1639
Toll Free Compliance Access Line	800-735-1185

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All reports to the Compliance Access Line may be made anonymously and on a confidential basis as allowed by law. HCSD policy and whistleblowers provisions of the False Claims Act protect employees from retaliation for reporting suspected fraud, waste, or abuse or non compliance with the Code of Conduct.

Please note that the Code of Conduct does not create any contract of employment, express or implied, between the HCSD and any individual. The HCSD reserves the right to amend the Code of Conduct at any time or from time to time in it sole discretion.

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ACKNOWLEDGEMENT

This is to acknowledge that I have read and understand the LSU Health Care Services Division Code of Conduct presented in pages 1 through 9 of this document on this _____day of _____, 20_____.

_____
(Print Employee's Name)

_____
Employee's Signature Date