



# CODE OF ETHICS

The Cook County Health & Hospitals System's Code of Ethics outlines our expectations of everyone within Cook County Health & Hospitals System (CCHHS), whether you are a part of the health and hospitals side of the system or part of the insurance plan. This applies to all CCHHS personnel, whether you are employed by the CCHHS or if you represent CCHHS in any way, this includes, but is not limited to, volunteers, independent contractors, consultants and other business partners (vendors) who are not employees but are working at CCHHS ("Personnel").

**We will conduct ALL our interactions respectfully, responsibly, honestly, professionally, and in compliance with laws, regulations, and policies of the organization.**

All Personnel are expected to uphold honest and ethical behavior, comply with laws, regulations, and system policies, and to fulfill their responsibilities as important members of the CCHHS organization. CCHHS management also has a duty to conduct business with integrity, to act responsibly and to be accountable for their decisions and actions made on behalf of CCHHS. Management is also expected to provide an environment where Personnel can feel comfortable raising concerns and reporting actual or potential instances of wrongdoing without the fear of retaliation.

**Compliance with the Code of Ethics is required.**

Failure to comply with the standards established and outlined by this Code of Ethics or to cooperate with CCHHS leadership regarding activities related to this Code may subject individuals to disciplinary action up to and including discharge of employment or termination of the written contract. Personnel who violate certain principles outlined in this Code may also be subject to fines and penalties imposed by the county, state and Federal government.

CCHHS Corporate Compliance is responsible for the final interpretation of this Code and will decide necessity for reviews and revisions.

**This Code outlines the culture and principles that are expected from EVERYONE.**

## **A. QUALITY OF CARE**

We will,

- Treat each patient and plan member with dignity, courtesy and respect. We make no distinction in the availability of services; the admission, transfer or discharge of patients; or in the care we provide based on age, gender, disability, race, color, religion, national origin, or any other characteristic protected by law.
- Provide a safe environment staffed by skilled and compassionate health care professionals who uphold standards of professional practice throughout all our facilities and programs.
- Promote the delivery of the highest quality of care that is both necessary and appropriate, within our capabilities and capacity, to patients and health plan members.
- Communicate through teamwork and collaboration to promote quality care and patient safety.
- Protect the privacy of our patients and health plan members by complying with all federal and state laws, organizational policies.
- Commit to timely, thorough, and accurate medical record documentation that supports the quality care provided to our patients and plan members.
- As a provider of care, we will follow the requirements of the Emergency Medical Treatment and Labor Act, also known as EMTALA, by providing for an appropriate medical screening examination to determine whether or not an individual requesting such examination has an emergency medical condition and if the patient is determined to have an emergency medical condition, the patient will receive treatment within CCHHS capabilities and capacity until the condition is stabilized or an appropriate transfer to another facility can be made. CCHHS will accept an appropriate transfer of a patient who requires its specialized capabilities or facilities if CCHHS has the capacity to treat the patient.
- Comply with all laws, regulations and organization policies required to promote workplace safety. These policies are in place to protect patients, visitors, and Personnel.

## **B. RESEARCH**

We will,

- Carry out research involving, human subjects in an ethical manner with the utmost integrity in accordance with federal regulations and organizational policies and procedures.
- Obtain approval for all research activities in advance by the Institutional Review Board of the Cook County Health and Hospital System and by CCHHS leadership.

### **C. ACCURATE RECORDS and RECORD RETENTION**

We will,

- Maintain complete and accurate books and records, this includes but is not limited to patient, employment, financial, and business records.
- Preserve and protect the privacy and confidentiality of all records, including patient, employee, and business information in accordance with county, state, and federal laws and regulations and organization policies.
- Record assets and liabilities and business expenses with accuracy and completeness. There shall be no undisclosed or unrecorded fund or asset in any amount for any purpose; no false or artificial entries for any purpose; and no payment shall occur, or purchase price be agreed to, with the intention or understanding that any part of such payment is for anything other than that described in the document supporting the payment.
- Document CCHHS business expenses properly and promptly with accuracy and completeness on expense reports in accordance with the applicable policy.
- Complete truthful time reporting indicating the correct and actual number of hours worked.
- Maintain all books and records in an accurate, complete and timely manner. Furthermore, as a government entity, we are subject to laws that require that certain records be retained for differing periods of time. It is our duty to comply with all policies regarding record retention, as well as all applicable laws.
- Commit to complete and accurate medical record documentation for each patient treated. In order to ensure that medical records can support all of their various purposes, it is extremely important that the records be timely, thorough and accurate.

### **D. CONFIDENTIALITY**

We will,

- Safeguard our patient's Protected Health Information (PHI) as well as CCHHS proprietary (private) information. Examples of proprietary (confidential) information include but are not limited to: financial accounting, acquisitions, Personnel files from human resources, intellectual property, information generated and contained within information systems or other internal records. Confidential information also includes any information that may not be obtained upon requests filed under the Illinois Freedom of Information Act (5 ILCS 140).
- Limit the use and disclosure of confidential information to the minimum amount necessary to carry out job responsibilities.
- Protect any and all electronic records within information systems or stored on electronic devices. Electronic devices includes but is not limited to portable electronic devices, such as laptops, tablets, smart phones, CDs, flash drives, jump drives, back-up tapes, etc.
- Utilize passwords and encryption process to protect all confidential information. We will never share our passwords.
- Use the utmost caution when communicating verbally and electronically. We shall comply with all facets of the Health Insurance Portability and Accountability Act (HIPAA) regulations and organizational policies.
- Be attentive to any documentation that contains social security numbers throughout the organization and careful protect the confidentiality of this information in accordance with the Identity Protection Act.

We will NEVER,

- Share or discuss confidential information outside CCHHS unless it is for approved business-related purposes or the disclosure is required by law.
- Misuse or disclose confidential or proprietary (private) information, including patient or Personnel records, hospital reports or tests, and any departmental files, documents, or data in financial reports and records.

### **E. FRAUD, WASTE, AND ABUSE**

**Instances of fraud, waste, or abuse are strictly prohibited and will not be tolerated.**

We will,

- Be consistently committed to prevent fraud, waste, and abuse recognizing we have obligations under many laws and regulations on local, state, and federal levels.
- Conduct all business and professional activities free of actual conflicts of interest, or the appearance of conflicts of interest, without favoritism or preference based on personal considerations. We will comply with the Conflict of Interest policy and we must disclose any actual or potential conflicts of interest.
- Submit accurate claims that follow policies and governmental guidance. This includes, but is not limited to accurate Medicare cost reports.
- Follow ethical coding practices by using defined coding methodologies pursuant to state and federal laws and regulations and in accordance with professional coding guidelines.
- Submit claims for medically necessary services and take steps to ensure that all claims are accurate and correctly identify the services ordered by a physician or other appropriately licensed individual.
- Should an error occur, we will promptly return all overpayments, whether governmental or private payer, and we will refund deductibles and co-payments.
- Commit to comply with laws, regulations, and policies that relate to contracts and arrangements with referral sources.
- Comply with anti-trust laws, including, but not limited to, restrictions concerning price information, referral, and discriminatory pricing.

We will NEVER,

- Engage in any conduct or scheme to cheat or defraud any health care program or governmental agency or falsify or conceal any facts concerning the delivery of services or payments of benefits in connection with any health care program.
- Prevent an individual from making reports for alleged facility mismanagement or fraudulent activities.
- Make false statements of any kind in any claim, cost report or application for health care benefits or retain any funds, on behalf of CCHHS, from federal, state or private insurance programs that employees or other Personnel knows have not been properly paid.
- Knowingly submit, on behalf of CCHHS, any claim for health care benefits if the employees or other Personnel has reason to believe that the services were not medically necessary.
- Present a claim on behalf of CCHHS to any governmental agency or other payer that is for an item or service that an individual knows was not provided or make any false representations regarding coverage of any patient services.
- Offer to pay any source for referrals of individuals to CCHHS for services or receive or attempt to receive payments from any source for referrals of individuals to other organizations.

## **F. SCREENING**

We will,

- Require mandatory excluded provider/sanction checks on potential and current employees and other Personnel to ensure services provided by excluded entities will not be paid under any governmental health care program, on or after the effective date of exclusion.
- Similarly we will perform excluded provider/sanction checks on potential and current vendors to ensure services provided by excluded entities will not be paid under any governmental health care program, on or after the effective date of exclusion.

## **G. ETHICS AND DISCLOSURES**

We will,

- Maintain high ethical standards and comply with all federal, state and local laws, including the Cook County Ethics Ordinance.
- Only engage in financial arrangements that compensate for fair market value for the services to our organization.

We will NEVER,

- Offer or accept any offer of an incentive that violates the federal anti-kickback statute or other similar federal or state statute or regulation
- Make, participate in making or in any way attempt to use our position to influence any actions or business decisions when we know, have reason to know or should know that we will personally benefit from those actions.
- Solicit, accept, receive or agree to receive, either directly or indirectly, anything of value, including but not limited to money, gifts, favors or promise of future employment, based upon any mutual understanding, either explicit or implicit, that would influence our actions, decisions or judgments on behalf of CCHHS.
- Ask for and/or accept any money or anything of value including, but not limited to, gifts, favors, services or promises of future employment, in return for advice or assistance on matters concerning CCHHS operations or business.
- Do business or have any type of financial interest in any business activity that involves any of CCHHS' operations or business.
- Make referrals for health services to an entity in which we individually have or an immediate family member has a financial relationship.

## **H. PERSONNEL PRACTICES**

We will,

- Follow the Personnel Rules and Human Resource policies.
- Promote an environment without discrimination based upon race, color, religion, sex, national or ethnic origin, age, disability, sexual orientation, pregnancy status or medical condition, marital status, mental or physical disabilities or any other characteristics protected by law, when hiring or conducting any other activities.
- Commit to a safe environment free from harassment or violence of any kind. Verbal, physical or visual disruptive behavior is strictly prohibited.

We will NEVER,

- Permit unlawful political contacts, unlawful political discrimination, and the use of political reasons or factors in any Personnel actions affecting positions unless such positions are legally exempt from such prohibitions.
- Participate in any Personnel decision, whether paid or unpaid, for a person who is an immediate family member.

## **I. POLITICAL ACTIVITY**

We will,

- Fully and completely follow the rules set forth in the Cook County Ethics Ordinance involving political activity.

We will NEVER,

- Compel, coerce or intimidate any individual or company to make or refrain from making any political contribution.
- Solicit any political contribution from employees or other Personnel, the spouses, domestic partners or civil union partners of or immediate family living with the employee or other Personnel.

- No employee or Personnel with decision-making authority shall serve on the political fundraising committee of any elected official or candidate for County office.
- Misappropriate any system resources, this includes Personnel, by engaging in any prohibited political activity for the benefit of any campaign for elective office or any political organization.

## **J. EDUCATION AND TRAINING**

We will,

- Train CCHHS Personnel, including officers, directors, members of committees with Board-delegated authority, employees, volunteers, and members of the CCHHS medical staff or house staff, researchers, students and agency Personnel on our Code of Ethics.
- Remind everyone that compliance is the responsibility of each and every one of us.
- Hold leadership accountable for the ongoing communication of these standards, as outlined in this Code of Ethics, to employees and others and to promote the culture of compliance.

## **K. DUTY TO REPORT VIOLATIONS AND NON-RETALIATION (PROTECTIONS FOR REPORTERS)**

You have a responsibility to,

- Report, in good faith, instances of wrongdoing without the fear of retaliation including the fear of being discharged, threatened or otherwise discriminated against regarding compensation, terms, conditions, location or privileges of employment in accordance with organizational policies, county, state, and federal laws and regulations, such the Deficit Reduction Act, and the Illinois Whistleblower Reward and Protection Act, and the Cook County Code of Ethical Conduct.
- Immediately raise concerns internally to report actual or potential instances of wrongdoing so that an investigation, followed by appropriate corrective action, may be taken.
- Report internally to your immediate supervisor, the Corporate Compliance Hotline, the Chief Compliance Officer or a member of the Audit and Compliance Committee of the Board of Directors.
- Always cooperate in any investigation, it is your duty. Failure to cooperate in an investigation will subject the individual to disciplinary action up to and including discharge of employment or termination of the written contract

You must NEVER,

- Engage in any type of retaliation against any individual who reports, in good faith, an instance of wrongdoing.
- Make a false allegation of an instance of wrongdoing. Should it be determined that the reporter knowingly and intentionally made a false allegation on an instance of wrongdoing, CCHHS will take appropriate corrective action against the individual, up to and including termination.

Corporate Compliance will,

- Keep compliance concerns confidential.
- Investigate concerns promptly.
- Protect those who report compliance concerns in good faith – this is the promise and the duty of the Compliance Program.

**We are individually and collectively responsible to report compliance concerns.  
We must do the right thing because it's the right thing to do.**

**If you have any questions regarding the Code of Ethics or if you are aware of any violations of the Code, contact**

- your supervisor,
- a concern related department (such as Human Resources, Safety, etc.), or
- the System Compliance Program.

### **How to report a compliance concern to the System Compliance Program:**

In writing to:  
The Corporate Compliance Program  
Cook County Health & Hospitals System  
1900 West Polk, Suite 123  
Chicago, IL 60612

Call our confidential hot line  
1-866-489-4949

or  
Report online  
[www.cchhs.ethicspoint.com](http://www.cchhs.ethicspoint.com)

E-mail us  
[compliance@cookcountyhhs.org](mailto:compliance@cookcountyhhs.org)

**The Compliance Program is your resource;  
we will help guide you in your decision-making.**