



2023

DENVER HEALTH CODE OF CONDUCT

The Denver Health Way

WHAT WE DO

And How We Do It



DENVER HEALTH™

— est. 1860 —

FOR LIFE'S JOURNEY

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DEAR DENVER HEALTH TEAM MEMBER,

Denver Health has developed this Code of Conduct to further our missions of providing high-quality patient care and affordable health insurance coverage and ensuring that we operate within the confines of the law and at the highest ethical standard. Maintaining a culture of compliance at Denver Health is everyone's responsibility, no matter your role.

At Denver Health, we believe in doing the right thing, the first time, every time. The purpose of this Code of Conduct is to help guide you in doing the right thing so that Denver Health is a place that we are proud to recommend to friends and family and an excellent place to work. We acknowledge that no set of standards can adequately anticipate every situation you may face. If you encounter a situation where you need guidance, or you believe part of this Code of Conduct has been violated, you should immediately consult your supervisor, another member of Denver Health leadership, the Chief Compliance and Audit Officer, or the ValuesLine by calling **1-800-273-8452** or by completing a web report at <http://www.denverhealth.ethicspoint.com/>. Per Denver Health's non-retaliation policy, there will be no retribution for asking questions, raising concerns or reporting possible misconduct in good faith.

We have been serving the people of Denver for more than 160 years and want to remain a trusted partner in the health care community for many years to come. Thank you for your dedication to doing the right thing and for preserving the integrity of our organization as we strive to achieve our mission together.

SINCERELY,

DONNA LYNNE, DrPH
Chief Executive Officer, DHHA

PIA DEAN
Chairman, DHHA Board of Directors



Do the Right Thing

A core value of Denver Health has always been to do the right thing. The Code of Conduct should be used as a guide to help you do the right thing and ensure that compliance is incorporated into the work you do every day no matter your role. Your behavior and the decisions you make have an impact on our organization and the community we serve. Refer to the Code of Conduct whenever you need guidance on appropriate actions to take in your work and whenever your intuition tells you that something doesn't feel quite right.

We count on you to be the eyes and ears for the organization and identify situations and behaviors that do not align with our ethical values. You are expected to speak up and report any wrongdoing that could put the organization, our patients, or team members at risk. At Denver Health you are protected from retaliation or retribution for voicing your concerns.

The Enterprise Compliance Program and the Code of Conduct set the ethical tone for all who work at Denver Health. Denver Health's policy is to promote ethical behavior and to act in accordance with federal, state and local laws and regulations. If you encounter situations that aren't addressed by the Code of Conduct, consult applicable policies or reach out for guidance and support.

Reach out for Help

You have many contacts and resources in addition to the Code of Conduct:

- Speak with your supervisor, other leaders in the organization, or a Human Resources representative.
- Call the Denver Health ValuesLine at **1-800-273-8452** or make a report using the web form at <http://www.denverhealth.ethicspoint.com/>. The ValuesLine is available toll-free 24/7. You can make an anonymous report to a trained professional that is not a Denver Health team member.
- Send an e-mail to ComplianceDHMP@dhha.org, Compliance@dhha.org, or ValuesLine@dhha.org.
- Access Denver Health's Enterprise Compliance Services Pulse subsite for more information or contact Enterprise Compliance Services by calling **303-602-3255** or sending a secure fax to **303-602-7024**. You are always welcome to stop by or make an appointment as well.
- If you decide to contact Enterprise Compliance Services, you may say who you are or remain anonymous. If you choose to remain anonymous, Denver Health will protect you from being known within the limits of the law.

We are committed to fostering an atmosphere of openness to ensure staff can ask questions and report concerns in good faith. Any instances of retaliation for doing so will be dealt with through appropriate disciplinary actions.

Who is responsible for following the Code of Conduct?

Compliance is everyone's responsibility, not just the duty of the Enterprise Compliance Services Department. Denver Health is committed to complying with all applicable laws and regulations and demonstrating high ethical standards in all that we do. Anyone who works for or on behalf of Denver Health is required to follow all applicable laws, Denver Health policies and procedures, and the Code of Conduct. It applies to all Board members, executives, and team members of Denver Health, including medical and professional staff, contract staff, vendors community partners, volunteers, students, residents and fellows, researchers, and all other team members collectively referred to as "Denver Health team members." To create and maintain a positive work environment, all Denver Health team members must use good judgment, be accountable for their actions, and conduct business with integrity while keeping the interests of team members, patients, and health plan members in mind.

Everyone must comply with the law and all relevant Denver Health policies, procedures, principles, and practices, including the Code of Conduct. Violators will be subject to counseling and/or corrective action, up to and including termination of employment and possible civil or criminal charges. Nothing in this Code of Conduct implies or creates the existence of a contract of any kind. Employment at Denver Health is "at will", meaning the employer or team member may terminate the relationship at any time with or without notice or cause.

As a Denver Health team member you must also:

- Complete all required compliance training for your role.
- Become familiar with the policies, procedures, and standards that apply to your work.
- Speak up if you are concerned or unsure about what you are being asked to do or what you see others doing.
- Report suspected or actual violations of laws, regulations, policies, and safety practices.
- Cooperate with investigations of potential violations of laws, regulations, and Denver Health policies.
- Refuse to participate in illegal, unethical, or unsafe acts, and report such acts when you are aware of them.
- Be guardians of Denver Health's reputation and assets.

Denver Health leaders should know the Code of Conduct well enough to explain it to their team members. They are also expected to create an environment that makes it easy to follow the Code of Conduct. As a key to creating such an environment, leaders should:

- Demonstrate support of the Code of Conduct by example.
- Create an environment where Denver Health team members are encouraged to report concerns and ask questions without fear of retaliation.
- Ensure that team members have every chance to live up to the Code of Conduct.
- Guarantee that team members receive all necessary training and education regarding general, practical and position-specific requirements.

How to follow the Code of Conduct

- Know the Code of Conduct and Denver Health policies. Understand the type of ethical conduct that is right for each type of business situation.
- Apply the Code of Conduct to your specific situation. Relate each area of conduct to your own circumstances by asking, "Am I personally in compliance with our standards? Are others I work with, or for, also in compliance?"
- If you have any questions on how to handle certain situations, seek assistance from your supervisor, other leaders in the organization, Enterprise Compliance Services, or through the Denver Health ValuesLine.
- Keep the Code of Conduct in a convenient location or go to the Denver Health Pulse site or PolicyStat for the most up-to-date version.

Refer to and Follow Laws, Regulations, and Policies

The Code of Conduct does not address every situation or issue that could arise in your work. The Code of Conduct provides general direction on a broad range of issues; however, laws and regulations may exist that have specific requirements for your particular job.

Denver Health has adopted policies, procedures, guidelines, standards, principles, and practices that apply to your job and how you conduct yourself at work. Because these policies are more specific to particular jobs, and some may be more restrictive than the standards of conduct in the Code of Conduct, be sure to read what applies to you. The Denver Health policies that apply to you can be found:

- In your department
- In the Denver Health Medical Staff bylaws and policies
- On the Denver Health Pulse
- In the Denver Health Policy Library at <https://denverhealth.policystat.com/>

If you have any questions about the Code of Conduct and/or any policy, procedure, guideline, principle or practice, talk to your supervisor, other leaders in the organization or Enterprise Compliance Services, or contact the ValuesLine. Remember, you are responsible for knowing which Denver Health policies apply to you and your job, and making sure you comply with them.

Our Bedrock: Denver Health Mission, Vision, and Values

The Code of Conduct is intended to be a resource and support for you to do the right thing at work. Our mission summarized below is at the bedrock and core of who we are and what we stand for. Being mindful of our organization's foundation when you do your job will make it easier for you to follow the Code of Conduct and help us continue to make Denver Health an organization we can all be proud of.

THE DENVER HEALTH MISSION

- Provide access to the highest quality health care, whether for prevention or treatment of acute and chronic diseases, regardless of ability to pay;
- Provide life-saving emergency medicine and trauma services to Denver and the Rocky Mountain region;
- Fulfill public health functions as dictated by the Denver Charter and the needs of the citizens of Denver;
- Provide health education for patients;
- Participate in the education of the next generation of health care professionals; and
- Engage in research, which enhances our ability to meet the health care and health plan needs of Denver Health patients, clients, and members.



DENVER HEALTH KEY STAKEHOLDER RELATIONSHIPS

To Our Patients, Clients, and Members – We commit to providing quality health care and health plan coverage that is caring, prompt and cost-effective.

To Each Other – We commit to treating all team members with respect and providing opportunities to develop professionally as part of a team.

To Our Third-Party Payors – We commit to working with our third-party payors in a way that honors our contracts and reflects our shared concern for quality and cost-effective health care.

To Our Regulators – We commit to complying with rules, regulations, and sound business practices. We commit to living by the Code of Conduct.

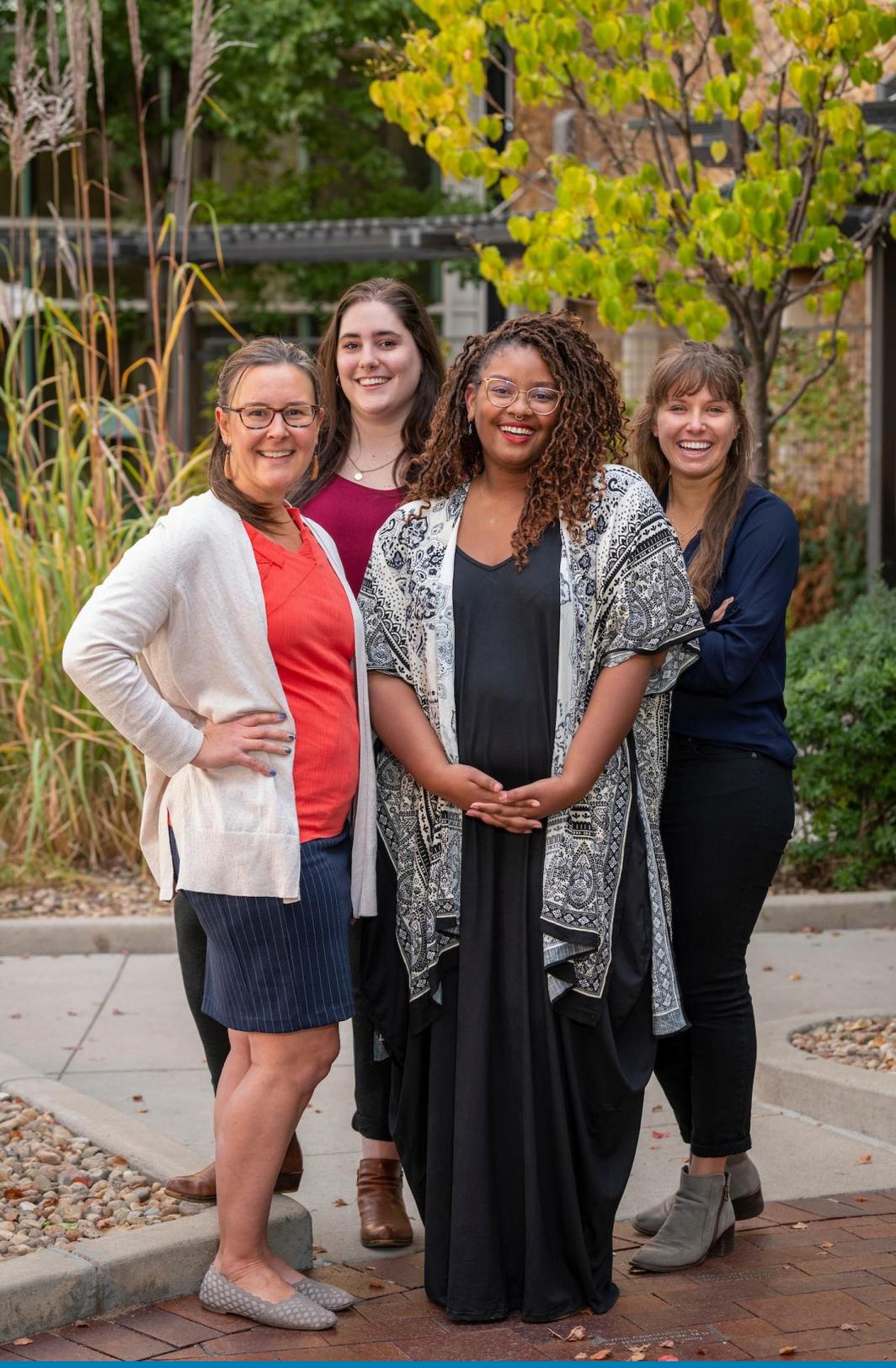
To Our Joint Venture Partners – We commit to managing our jointly-owned businesses in a way that reflects the mission and values of our organizations.

To the Communities We Serve – We commit to knowing the needs of the communities we serve and providing them with high-quality, cost-effective health care.

To Our Suppliers – We commit to a fair bidding process and to being a responsible customer.

To Our Volunteers – We commit to ensuring that our volunteers feel their work is meaningful and appreciated.

To Our Research and Grant Sponsors – We commit to engaging in quality research, ensuring the protection of our participants, and practicing sound financial and business practices.



HELP MAKE DENVER HEALTH A PLACE TO RECOMMEND TO FRIENDS AND FAMILY

PRESERVE THE TRUST OF OUR PATIENTS AND MEMBERS

Provide Safe and High-Quality Services

Denver Health is dedicated to providing and ensuring high-quality, safe care for our patients and members. This dedication can be seen in the culture of safety that has been fostered by encouraging attentiveness and devotion to our patients. We respect our patients and members and deliver compassionate care that is both necessary and appropriate. Denver Health has a comprehensive quality and safety program to provide strategic oversight for putting patients first and prioritizing attentiveness and dedication to patient needs while ensuring safe, accurate, and effective care. This commitment to quality of care and patient safety is an obligation of every Denver Health team member.

Protect Patient and Member Rights

At Denver Health we treat our patients and members with dignity, compassion, and the utmost respect for their rights. We treat patients and members competently, which requires maintaining the disciplinary skill level required by law and clinical best practices. We base all patient care decisions on patient needs, not financial reward.

Denver Health makes no distinction in the availability of services; neither in the admission, transfer, or discharge of patients, nor in the care provided based on a patient's age, gender, disability, race, color, religion, sex, sexual orientation, gender identity, or national origin. Denver Health recognizes and respects the diverse backgrounds and cultures of its patients and makes every reasonable effort to equip caregivers with the knowledge and resources necessary to respect each patient's cultural and physical needs. We respect the patient's right to and need for effective communication.

To ensure that patients, members and/or their representatives have the information necessary to exercise their rights, each patient is offered a written statement of patient rights and a notice of privacy practices. These statements outline the rights for informed decision making regarding medical treatment, payment, and health information, and conform to all applicable state and federal laws by addressing:

- Diagnosis and treatment plans;
- Right to refuse or accept care;
- Care options;
- Advance directive and proxy health care decision-making options and limits;
- Organ donation and procurements; and
- Risks and benefits associated with available treatment options.

We always respond to a patient's request to transfer to another care facility and explain the limits, risks, and benefits of such requests and discuss all options. We also take care of the patient's non-clinical needs by providing:

- Privacy, security and protective services;
- Opportunity for resolution of complaints; and
- Pastoral counseling.

We do not limit patients visitors, mail, telephone use or other communication unless required for patient care or compliance with hospital rules such as visiting hours. We explain the reason(s) for any limitations to the patients' and their family, caregivers, and representatives.

We provide health education, health promotion, and illness-prevention programs as part of Denver Health's efforts to improve the quality of life for our patients and our communities.

We inform our patients, members – and when appropriate, their families – about outcomes of care, treatment, and services that have been provided, including unanticipated outcomes. We also include them in discussions in addressing medical challenges when clinically appropriate.

Our patient and health plan representatives are available for our patients and members to communicate complaints and grievances, and we have mechanisms in place to promptly address and resolve matters and inform our patients of the resolution.

Refer to [Patient Rights and Responsibilities, Discrimination and Harassment Prevention, Notice of Privacy Practices](#), and the [Concern/Complaint/Grievance](#) for more information.

Report Patient Safety Events

As a Denver Health team member you play a critical role in promoting and ensuring high-quality and safe care for our patients. We expect you to speak up through appropriate channels if you believe the Denver Health commitments to quality and patient safety are not being met. Anyone who retaliates against someone reporting patient safety and quality concerns in good faith will receive corrective action up to and including termination of employment. Channels to report quality and safety concerns include telling your supervisor or other leaders in the organization, completing an adverse event report, contacting the Office of Quality and Patient Safety, or reporting through the Denver Health ValuesLine.



To create and sustain a culture of patient safety and quality, Denver Health uses **STARS (Safety, Tracking And Reporting System)**, a reporting tool that increases awareness of patient safety concerns. The system replaces the previous SI reporting system that will be retired in February.

Report in real time all patient safety and quality of care concerns by accessing the STARS icon available on all Denver Health desktops. Each adverse event report is routed to an interdisciplinary team as determined by the specific event type and location. This team will evaluate the event to identify opportunities to improve patient care. You can contact the Patient Safety and Quality or Risk Management departments with any questions or concerns.

Refer to **Occurrence Reporting** for more information.

Comply with the Emergency Medical Treatment and Active Labor Act (EMTALA)

Denver Health provides emergency medical screening examination and necessary medical stabilization to all patients in need of emergency care regardless of ability to pay. Provided that we have the capacity and capability, anyone presenting at Denver Health with an emergency medical condition is treated.

Denver Health does not admit, discharge, or transfer patients with emergency medical conditions based on their ability or inability to pay or any other discriminatory factor. Patients with emergency medical conditions may only be transferred to another facility at the patient's request or if the patient's medical needs cannot be met at Denver Health and appropriate care is known to be available at another facility. Patients are transferred in accordance with EMTALA and other applicable state and federal regulatory and statutory requirements.

Refer to **Emergency Medical Treatment and Active Labor Act (EMTALA)**, **Missing Persons and Leaving Against Medical Advice, Transfer of Acute Trauma Patients by Private Occupancy Vehicle (POV) WPMC, Interfacility Adult and Pediatric Trauma Patient Transfer from WPMC**, and **Denver Health Patient Services Policy** for more information.

Q & A

Q: Jane presents to the Emergency Department (ED) with a laceration. The ED is very busy and the nurse thinks she would get faster treatment if she went to the urgent care center down the street. Is it acceptable to send her to the urgent care center so ED staff can concentrate on treating more urgent conditions?

A: Although it may be tempting to relieve the ED of patients with minor conditions, EMTALA requires that all patients who present to the ED requesting medical care must be screened before they are discharged or referred to another facility.

Q: A patient comes to the Emergency Department (ED) with a possible ear infection. The patient has insurance that requires a condition to be serious before they should use the ED for care. I am concerned that the insurance will not cover the visit. Should we still see the patient?

A: Federal and State regulations protect patients from out-of-network expenses relating to ED visits, and we must provide patients who seek treatment for emergency medical conditions with appropriate medical screening and stabilize all emergency conditions regardless of patient's insurance requirements and/or his or her ability to pay.

Acknowledge
Introduce
Duration
Explain
Thank

Wear your Badge Identification

Always wear your Denver Health identification badge so that patients and members know who is treating them and your fellow Denver Health team members know who is working with them.

Use “AIDET” – the recommended way to begin any encounter – in all introductions with other Denver Health team members and patients to help guide and hardwire effective communication. The five fundamentals of AIDET can be found to the left.

Refer to **Identification Badges** and **Personal Appearance / Dress Code** for more information.



SAFEGUARD CONFIDENTIAL INFORMATION

Patient Health Information

Since we must collect personal information from a patient or member about a medical condition, history, medication, family illnesses, and insurance coverage, we are committed to maintaining its confidentiality consistent with the Health Insurance Portability and Accountability Act (HIPAA), the Health Information Technology for Economic and Clinical Health (HITECH) Act, and other state privacy laws. We do not use, disclose, or discuss protected health information (PHI) with others unless it is necessary to serve the patient/member or disclosure is permitted or required by law.

Denver Health team members ALWAYS:

- Access, use and discuss only the minimum amount of information necessary to do your job in a clinical, administrative, and/or business role.
- Access secured areas only if it is required as part of your job or on a need-to-know basis.
- Use appropriate places to have confidential discussions and speak in reasonable volumes to limit unintended disclosures.
- Keep electronic devices secure, encrypted and password protected.
- Remove all non-essential information from an email before you forward it.
- Send patient PHI or other sensitive information encrypted via SafeMail by adding “Secure,” “SafeMail,” “Encrypt,” or “PHI” in the subject line of the email.
- Double-check that the number to which you are sending a fax is correct.
- Confirm all doors to restricted areas with sensitive information are kept locked.



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DUANE MATA, DDS
DENTAL DIRECTOR

- Retrieve printouts containing PHI promptly from shared fax machines and printers.
- Use a privacy screen on your computer monitor if the screen is visible or readable by others.
- Dispose of hard-copy PHI only in secure shredder bins.
- Log out of a shared computer or lock your computer before walking away from it so others cannot use it with your user login.
- Restrict vendor access to PHI unless an appropriate process has been followed (for example, under HIPAA, a vendor must sign a business associate agreement if it creates, receives, maintains and/or transmits PHI on behalf of a Denver Health entity or business associate).
- Verify electronic documents do not contain unnecessary data. Ensure there are no hidden columns, rows, or tabs in spreadsheets before attaching and sending.

You should NEVER:

- **Access your family or friend's information:** You are not permitted to check out an upcoming appointment or view test results of a family member or friend in any of Denver Health's medical record or claims systems. Use MyChart or follow appropriate release of information processes and do not use Denver Health systems you have team member access to use.
- **Access a co-worker's chart:** You are not permitted to access medical or other personal information of Denver Health team members, unless you are providing services as a part of your Denver Health duties.
- **Access VIPs:** You are not permitted to access personal or health information on high-profile individuals (or those who are in the news) who are receiving services from Denver Health or another provider through the Health Plan. For example, if you see a report on the news about a shooting and the victim(s) are sent to Denver Health for care, you are not permitted to check out their record.

All Denver Health team members are trained on privacy and information security laws and regulations and must abide by all Denver Health information security and confidentiality policies and procedures.

Team members who receive their care at Denver Health have the same privacy rights and protections as non-team member patients. No PHI related to treatment of a team member as a patient at Denver Health may be disclosed to Denver Health Human Resources, other employment administrative functions, supervisors, or co-workers without specific authorization from the team member patient. If a Denver Health team member is a patient and information is discovered that may be concerning to Denver Health as the employer, that information MAY NOT be disclosed to Human Resources or any other areas of the organization, for any reason other than treatment, payment, and/ or health care operational purposes.

Refer to **Protected Health Information Uses and Disclosures without Authorization Policy** for more information.

Q & A

Q: What types of patient and member information should be kept confidential?

A: All forms of patient and member information must be kept confidential whether it is written, spoken, recorded electronically or printed. Patient information should not be discussed in public areas such as elevators, hallways, or cafeterias. Nursing stations are not always private. Printed patient information should not be left out for public view and should be disposed of properly.

Q: I have access to patient records and hear that a friend has been hospitalized. Would it be okay for me to look up the friend's medical record to learn more about the diagnosis?

A: No, that is a HIPAA violation and breach of the patient's right to privacy, even if you only wanted to be assured that the patient's life was no longer in danger. It is never ethical to look in a patient's record unless it is required as a part of your job.

Q: I was eating in the Denver Health cafeteria and overheard doctors having patient rounds and discussing patient care. What should I do?

A: If you feel comfortable doing so, let the doctors know that you can hear them speaking about patient care and are concerned that others may hear as well. Remind them that patient care is confidential information, and inadvertent disclosure is a HIPAA violation. If you do not feel comfortable, speak with your supervisor, another leader in the organization, Enterprise Compliance Services staff, or contact the Denver Health ValuesLine.

Q: As part of the routine exam of a team member/patient, I discovered that the team member tested positive for illegal drug use. May I report that information to the Denver Health Human Resources department or the team member's supervisor out of concern for their fitness for duty?

A: No, that information is confidential and may not be reported to Denver Health Human Resources department or anyone else at Denver Health without the patient's authorization.



Confidential Business Information

Confidential business information refers to proprietary information about Denver Health's strategies and operations as well as patient information and third-party information. Confidential information covers virtually anything related to Denver Health's operation that is not publicly known. Improper use or disclosure of confidential business information could violate legal and ethical obligations.

Denver Health team members may use confidential business information only to perform their job responsibilities and cannot share such information with others unless the individuals and/or entities have a legitimate need to know the information in order to perform their specific job duties or carry out a contractual business relationship, provided that disclosure is not prohibited by law or regulation.

If an individual's employment or contractual relationship with Denver Health ends for any reason, the individual is still bound to maintain the confidentiality of the information viewed, received, or used during the employment or contractual business relationship with Denver Health.

Do not discuss confidential matters where you might be overheard such as on an elevator, in a hallway, or in the cafeteria. Share confidential data only on a need-to-know basis. If in doubt about a need-to-know situation, talk to the Office of General Counsel ("Legal Services") or Enterprise Compliance Services.

Refer to the **Confidentiality** policy for more information.

Q & A

Q: I have a friend who works at another hospital and we often share stories about work. Is this wrong?

A: No, as long as the stories are general in nature. However, certain types of information would be inappropriate to discuss. For example, sharing of information that would breach patient confidentiality or that is confidential to Denver Health and its entities (prices, costs, terms, business policies and plans, etc.) is not allowed. This type of information sharing is unethical and, in many cases, illegal.

Record Retention

Keep all records for as long as the law requires and in compliance with the Denver Health document retention policies and procedures. This includes department, legal, financial, personnel and patient care-related records.

Always retain records that are part of a government inquiry, audit, or legal action. If you destroy any of these records, you can be charged with obstruction of justice. In all cases, never destroy or dispose of Denver Health records or files without getting the approval of your manager or supervisor.

Refer to the [DHHA Records Retention & DHMP Records Retention](#) policies for more information.

ENSURE INTEGRITY IN FINANCIAL AND BILLING MATTERS

Prevent and Detect Fraud, Waste, and Abuse

Financial stewardship is critical to fulfilling our mission and making sure Denver Health is around for many years to come. Preventing and detecting fraud, waste, and abuse in all areas of our organization is part of this stewardship.

Fraud is a deception or misrepresentation made intentionally or with reckless disregard for the truth, knowing that the deception could result in some unauthorized benefit to the perpetrator, another individual, or another entity. Fraud can take many forms including but not limited to: embezzlement, false claims, kickbacks, bribery, false financial reporting, software piracy, credit card fraud, expense account fraud, identity theft, medical identity theft, false workers' compensation claims, fraudulent vendor billing, member fraud, mail fraud, backdating documents, and falsifying timecards.

Waste is defined as the over-utilization and misuse of services or other practices that result in unnecessary costs to the health care system, including the Medicare and Medicaid programs.

Abuse includes any practice that may, directly or indirectly, result in:

- Unnecessary cost to the health insurance payer, including the Medicare, Medicaid, and CHP+ programs
- Improper payment for services
- Payment for services that fail to meet professionally recognized standards of care or contractual obligations
- Services that are medically unnecessary

Common examples include, but are not limited to, misusing codes on a claim or billing for unnecessary treatment.

All team members play a key role in helping to prevent, detect, and correct instances of fraud, waste, and abuse at Denver Health. Prevention occurs by following our policies and procedures, including this Code of Conduct, and staying informed and knowledgeable about how to identify fraud, waste, and abuse through training and other communication vehicles. You play a key role in detecting and correcting potential issues by promptly reporting concerns and suspicious activity.

Accurate Documentation, Coding, and Billing

Denver Health is committed to accurate record-keeping, coding, billing and claims submission and payment. We prohibit any team member or agent of Denver Health from knowingly presenting or causing to be presented claims for payment or approval which are false, fictitious, or fraudulent. We encourage all team members to report concerns about financial and billing integrity matters immediately. Common risk areas associated with claims preparation and submission include: inaccurate coding, up-coding, unbundling of services, billing for medically unnecessary services or other services not covered by the relevant health care program, billing for services not provided, duplicate billing, insufficient documentation, and false or fraudulent cost reports.

The federal and state of Colorado False Claims Acts provide for civil financial penalties for anyone who knowingly submits, or causes the submission of, a false or fraudulent claim to the government. Deliberate or reckless disregard for the truth or falsity of the claims submitted also can lead to violations. The state and federal False Claims Acts include a "whistle-blower" provision that allows people outside the government to report fraud and potentially receive a portion of any money that is recovered in the case. If successful, the government can recover up to three times the amount at issue plus additional fines and penalties. The state and federal False Claims Acts also include protections from retaliation for whistle-blowers.

Providers and entities within Denver Health will only bill and submit claims for services that are actually provided and medically necessary. All claims or requests for reimbursement must be complete and accurate and must reflect reasonable and necessary services ordered by an appropriately licensed medical professional who is a participating provider in the health care program from which Denver Health is seeking reimbursement.

A key part of Denver Health's ethical and professional responsibility is proper documentation. In support of accurate proper billing, medical records must provide reliable documentation of the services rendered and the need for such services based on clinical diagnoses. Each team member who documents is responsible for creating and maintaining accurate, complete, and timely patient-care records. Each team member who contributes to medical records and documentation must ensure that medical records do not contain false or misleading information and that they meet the requirements of all laws, regulations, and Joint Commission standards as well as Denver Health policies and procedures.



Each Denver Health team member is responsible for the integrity and accuracy of our organization's documents and records, not only to comply with regulatory and legal requirements, but also to ensure records are available to support our business practices and actions. Never sign a document unless you know it to be accurate. No one may alter or falsify information on any record or document. Further, records must never be destroyed in an effort to deny governmental authorities access to information that may be relevant to an investigation. Never destroy or dispose of Denver Health records or files without getting the approval of an authorized Denver Health manager.

If Denver Health makes an error in a bill or claim, we will promptly correct the problem by taking one or more of the following steps:

- Refund overpayments or payments made in error.
- Resubmit or reprocess claims.
- Provide additional team training.
- Contact government authorities.
- Create new or revised policies and procedures.
- Implement other corrective actions as deemed necessary.

Please report any potential concerns of documentation, coding or billing integrity as well as any other type of fraud and abuse to Enterprise Compliance Services:

- Call Enterprise Compliance Services at **303-602-3255**;
- Send a letter to:
Enterprise Compliance Services
601 Broadway, Mail Code 7776
Denver, CO 80204; or
- Email **ComplianceDHMP@dhha.org** (for DHMP concerns), or **Compliance@dhha.org** or **ValuesLine@dhha.org** (for DHHA concerns) or;
- Make a report (you can do so anonymously) using the Denver Health ValuesLine by calling **1-800-273-8452** or by completing a web report at **<http://www.denverhealth.ethicspoint.com/>**.

Refer to **Enterprise Compliance Program, Documentation Addendums for Professional Coding and Billing, False Claims, Fraud, Waste and Abuse**, and **DHMP**

for more information.

Q & A

Q: I have knowledge of inaccurate billing procedures related to the use of codes in a nearby department. Though I do not work in this area, should I do anything about this?

A: Federal and state law prohibit the submission of false information to obtain payment for health care services. If you have reason to believe that procedures or diagnoses are being improperly coded, you should promptly report your suspicions to your supervisor, Enterprise Compliance Services or the Denver Health ValuesLine so the matter can be reviewed and corrective action taken.



Q & A

Q: A patient is upset because his insurance will not pay for his routine physical. He says, "If you just change the diagnosis code to 'high blood pressure' my insurance will cover it." Should I change it so the claim gets paid by insurance?

A: No. If his visit was a routine physical, it would be fraudulent to change a code for the sole purpose of collecting a payment. Physician documentation for the patient visit must match the diagnosis code so that an accurate claim will be submitted to insurance for payment.

Q: I have a concern that one of the billing staff members in my area is not complying with established billing guidelines. Should I report this to my supervisor or should I wait and see if the errors are discovered later?

A: You should report this to your supervisor, Enterprise Compliance Services, or the Denver Health ValuesLine if you wish to remain anonymous. The issue will be reviewed and handled appropriately. It is important that all billing guidelines are followed and errors, intentional or unintentional, are corrected promptly.

Honest Financial Reporting

Denver Health is required by federal and state laws and regulations to submit reports of our operating costs and statistics to claim reimbursement for the cost of services provided to government health care program beneficiaries. All financial and statistical data used in any financial, accounting, or cost report preparation must provide accurate and timely information. Denver Health complies with all federal and state laws, regulations, standards, and guidelines relating to all financial, accounting, and cost reports.

Refer to [Financial Audits](#) for more information.



Responsible Expense, Invoice, Payroll, and Time Reporting

Denver Health team members who submit any reports including but not limited to expense reports, invoices, and payroll and time records must do so completely, accurately and on time. When using the time-tracking system, you are indicating how you spent your work time, and as such, you must do so truthfully. When submitting an expense report, you are guaranteeing that the expenses were for legitimate business purposes on behalf of Denver Health. Reports of expenses, invoices, and payroll and time records must never be falsified and should always provide appropriate supporting documentation in alignment with associated Denver Health policies, procedures, guidelines, principles, and practices.

Refer to **Accounts Payable Invoice to Payment, Employee Travel, Payroll Processing, Time and Effort Reporting, Contract Policy, Signature Authority for Expenditures**, and **Non-Exempt Employees Time Card Documentation** for more information.

Acknowledgment of Anti-trust Laws / Competition

Denver Health policy requires team members to comply fully with all federal and state anti-trust laws in interactions with competitors, and to protect confidential Denver Health information and business practices. It is not unusual to obtain public information about other organizations, including our competitors, through legal and ethical means such as public documents, public presentations, journal and magazine articles and other published and spoken information. However, team members should avoid seeking or receiving information about a competitor through other non-public means if they know or have reason to believe the information is proprietary or confidential. Team members should not seek information directly from a competitor that is not readily available to the public.

Competitors are not allowed to agree to set prices or reimbursement rates for any services provided, and Denver Health team members must follow laws related to competition and anti-trust. Report any knowledge or suspicion of this type of behavior to Enterprise Compliance Services.

In addition, Denver Health team members are not allowed to conspire with competitors about restricting competition. Ways to restrict competition include but are not limited to: (1) deciding who will be involved with a line of business, a sales prospect, a sales region, or a customer; (2) telling a competitor about your dealings with suppliers, insurance firms or patients; (3) sharing non-public data about market share, prices, costs, revenues, or salary levels; and (4) making an arrangement with another business to share information about Denver Health salary and wages or other non-public information.

Responsible Conduct with Research and Sponsored Programs

At Denver Health we engage in research, investigations, and clinical trials to assist in advancing and addressing disparities in health care including the discovery and development of treatments and cures for conditions and diseases. Denver Health is committed to fostering an environment of uncompromising integrity and ethical conduct in research. Through appropriate control processes, Denver Health's



administrative and clinical leadership ensures that its researchers, sponsors, and Institutional Review Boards (IRBs) address the protection of research participants. All Denver Health team members involved in any element of Denver Health research must comply with all relevant laws, regulations, Denver Health policies, and core values. Individuals engaged in research must also complete research-related trainings.

All Denver Health team members interested in conducting research at Denver Health must obtain the appropriate institutional approvals. Additionally, any person engaging in human subject research at Denver Health must obtain IRB approval prior to engaging in research. The IRB confirms that each proposed human subjects research study adequately addresses the protections of study participants through the evaluation of each study's benefits and risks, approaches to subject recruitment and selection, and documentation of informed consent. The IRB also verifies that the study design addresses the privacy rights of the participants and the confidentiality of study data, including adherence to HIPAA regulations. Any person engaging in animal research at Denver Health must obtain Institutional Animal Care and Use Committee (IACUC) approval prior to engaging in research.

Denver Health's principal investigators, their staff and other managers involved in research ensure:

- Appropriate study outcomes through sound study design; effective oversight of the study protocol; compliance with applicable federal, sponsor, and institutional guidelines; and approval by the appropriate IRB and the Denver Health Sponsored Programs and Research Office (SPARO) prior to study initiation.
- Protection of study participants by disclosing potential conflicts of interest; developing and monitoring plans to control study risks; employing appropriate recruiting and informed consent processes; being responsive to concerns and complaints expressed by study participants; reporting unanticipated problems promptly; and properly acquiring, maintaining, and protecting research data.
- Exemplary professional conduct through intellectual integrity in formulating, conducting, and reporting research results.

Denver Health researchers provide one-on-one communications that allow research participants (prior, current, or prospective) to ask questions or raise complaints about a research protocol. Denver Health also respects patients' rights to choose to participate in a research study or not. Refusing to participate in a trial will in no way compromise their access to services at Denver Health.

Denver Health's administrative and clinical leadership ensure that sponsored research agreements comply with Denver Health policies and procedures and with any regulatory or statutory requirements on the conduct of research. Research misconduct is not tolerated at Denver Health, and any allegations are promptly investigated in compliance with related regulations and Denver Health policies and procedures.

As in all accounting and financial record-keeping, our policy is to submit only true, accurate, and complete costs related to research grants. If you suspect instances of research misconduct, fraud, waste, or abuse on a research or sponsored project, you should report the matter immediately to your supervisor, Enterprise Compliance Services, or the Denver Health ValuesLine. You may also choose to report fraud, waste, and abuse directly to the sponsor.

Refer to **Responsible Conduct of Research, Human Subject Protections and Informed Consent for Research Studies, Responding to Allegations of Research Misconduct**, and **Ancillary Billing for Research Studies** for more information.

MAKE DECISIONS THAT ARE OBJECTIVE AND FREE FROM IMPROPER INFLUENCE

Avoid Conflicts of Interest

Denver Health has been a pillar of the community as a safety-net hospital for over 160 years. The Denver Health Medical Plan has provided cost-effective health plan coverage through Medicare, Medicaid, and commercial lines of business since 1997. We have worked hard to build the trust that our patients, members, and community have in us, and it's important to protect that trust by ensuring integrity in all that we do. This means eliminating actual or even the appearance of any improper influence in the workplace decisions we make. When potential conflicts of interest are handled incorrectly, they can put Denver Health at risk of fines; litigation; penalties; criticism from patients, members, interest groups, or government agencies; and negative perceptions with the public, including in the media.

If you have a conflict of interest or it could be perceived that you have a conflict of interest, the objectivity and fairness of your decisions could be questioned. A conflict of interest may occur if your outside activities, personal financial interests, or other private interests interfere or appear to interfere with your ability to perform work or make business decisions at Denver Health objectively and effectively. Denver Health team members are obligated to ensure they remain free of conflicts of interest that may affect the performance of their job responsibilities at Denver Health, and to work with Enterprise Compliance Services in managing even the appearance of conflicts. Managing real or perceived conflicts of interest is a collaborative process that ensures all involved are in agreement as to how to protect Denver Health from perceived undue influence in our work.

To maintain the highest standard of public trust and integrity, all Denver Health team members are expected to carry out their duties honestly, responsibly and in full accordance with the highest ethical and legal standards. As a first step to identify and resolve conflicts of interest, all Denver Health team members must immediately disclose any perceived, potential, or actual conflicts of interest by either completing the Conflicts of Interest questionnaire or reporting directly to Enterprise Compliance Services.

Examples of potential conflicts to avoid include:

- Making Denver Health job decisions that are personally beneficial but not in the best interest of Denver Health and its patients, clients and members.
- Profiting financially from sources outside of Denver Health because of your role at Denver Health.
- Spending work time on activities other than Denver Health activities.
- Using Denver Health assets for purposes other than those directly related to your job at Denver Health.
- Personally gaining from your involvement in a research study or project.
- Supervising a family member working at Denver Health.
- Accepting or soliciting any fee, compensation, gift, gratuities, favors, payment of expense, or any other thing of monetary value from contractors, parties to subcontracts, vendors, or other outside parties, except as expressly authorized by policies of Denver Health

We also seek to avoid organizational conflicts of interest which may arise when a non-federal entity with a federal contract or grant award has a relationship with a parent company, affiliate, or subsidiary organization which causes that entity to be unable or appear to be unable to, remain impartial in business transactions involving the parent company, affiliate, or subsidiary organization. In procurement, organizational conflicts of interest mean that because of relationships with a parent company, affiliate, or subsidiary organization, Denver Health is unable, or appears to be unable, to be impartial in conducting a procurement action involving a related organization.

Due to the range of Denver Health's activities, it is not possible to provide an exhaustive list of conflict of interest situations. The conflict of interest policies available on the Denver Health Pulse outline examples of conflict of interest situations, as well as the procedure for reporting or declaring a conflict of interest.

Refer to **Conflicts of Interest** and **Gifts and Interactions with Vendors** for more information.

Q & A

Q: I work in our Emergency Department, and I am considering starting a business selling resuscitative equipment over the Internet. Is this a conflict of interest?

A: This type of secondary employment may be a conflict of interest. Consult your department director and/or HR for guidance before proceeding.

Know the Outside Employment Boundaries

Employment at Denver Health is considered primary to any other employment. Denver Health expects all Denver Health team members to be transparent and disclose any outside employment relationship, including self-employment. Employed managers, supervisors, and Medical Staff should not have any simultaneous employment relationship, including self-employment, unless it has been vetted with Enterprise Compliance Services and approved by the Chief Human Resources Officer for management and supervisory personnel or the Chief Medical Officer for employed Medical Staff. Medical Staff in particular must report any outside engagement involving the provision of clinical care as it may impact governmental immunity for medical malpractice liability under Colorado State law.

Business for approved outside or self-employment relationships should never be conducted on Denver Health paid time or using Denver Health resources including property, equipment, utilities, data, non-public information, etc. Additionally, soliciting Denver Health team members and patients for business related to your outside employment relationship is prohibited.

Refer to [Conflicts of Interest](#) for more information.

Maintain Appropriate Contractor and Vendor Relationships

Denver Health is committed to maintaining positive working relationships with contractors, sub-contractors, third-tier downstream entities, and vendors. We select third-parties to engage in business based on clinical and business needs, evaluating their quality, price, and performance history. Denver Health's relationships with these companies is impartial and follows the relevant policies and procedures. Confidential information about contracts with contractors, sub-contractors, and vendors should not be released to any third party without permission, unless required by law and authorized by the Office of General Counsel of Denver Health.

Know the “Do's” and “Don'ts” Regarding Gifts and Interactions with Vendors

At Denver Health we do not let gifts cloud our judgment. Each Denver Health team member must be absolutely sure that even permitted items do not create questions about our motives or activities and do not create questions about our integrity or reputation. If you are the least bit unsure, contact Enterprise Compliance Services or the Denver Health ValuesLine before offering or receiving gifts or business courtesies.

We communicate to vendors, patients, members, and others that our values limit what we can give and receive because we want our service and business relationships to stand on their own.

Review Denver Health policies that apply to you as they may be more restrictive than what is described here.

GIFTS FROM VENDORS

We never offer or accept anything of value in exchange for referrals or other business. All gifts, entertainment and business meals provided or received must be infrequent, reasonable, and small enough that they do not even create an appearance of influencing our decision making.

GIFTS FROM PATIENTS AND MEMBERS

There may be times where a patient or member wants to acknowledge a team member's exceptional service and offer thanks by providing a gift. Although personal gifts are discouraged, perishable items such as food or flowers that cannot be returned or exchanged for cash value may be accepted and shared with other team members. Items such as event tickets, gift certificates, or cash-equivalent forms of gifts should be donated to the Denver Health Foundation Office. The Denver Health Foundation is the primary vehicle for accepting major gifts.

GIFTS YOU CANNOT ACCEPT

As a Denver Health team member, there are certain gifts that are prohibited:

- Gifts or sponsorships with conditions attached
- Tips, gratuities, or personal donations
- Cash or cash equivalents such as checks, gift certificates, gift cards, vouchers, and coupons
- Weapons of any kind
- Tobacco of any kind
- Drugs of any kind
- Items that reasonably may be viewed as vulgar, pornographic, or offensive

Gifts that are prohibited must be refused, returned immediately to the sender, or reported to Enterprise Compliance Services for appropriate treatment.





GIVING GIFTS FROM DENVER HEALTH

Generally, Denver Health resources should not be used to purchase gifts for vendors, patients, members, or government officials. There may be situations where this would be permissible, but before offering a gift or anything of value, you need to make sure that doing so does not violate any laws, Denver Health policies or procedures, or the recipient's gift policy. There also cannot be any intention, or risk of an appearance of an intention, to gain influence or some other kind of advantage by making a gift.

TRAVEL, HONORARIA AND SPEAKER'S FEES

All speaking or consulting relationships and contracts should be reviewed and approved by a supervisor, Enterprise Compliance Services, and the Office of General Counsel, even if conducted on non-Denver Health time. Denver Health team members:

- May receive reasonable honoraria and reimbursement for travel and other expenses associated with speaking or making a substantive presentation in a legitimate conference, task force, or meeting;
- May not accept honoraria, consulting fees, speaker's fees, paid attendance, travel, or other expenses for meetings, conferences, or other outside activities from vendors without prior approval;
- May turn over to Denver Health any honoraria, speaker's fees, consulting fees, paid attendance, travel or other expenses for meetings and conferences when done on Denver Health time;
- May accept honoraria for personal use if the approved presentation, consultation, and all related preparation were done on non-Denver Health time.

Refer to the **Conflicts of Interest**, **Regulation of Pharmaceutical Industry Representatives**, **Medical Device Industry Representatives**, and **Gifts and Interactions with Vendors** policies for more information.

Q & A

Q: In appreciation of our business, a vendor occasionally invites me to dinner or other entertainment activity and pays for the cost. Is it appropriate for me to accept the invitation?

A: Extending or accepting business courtesies may raise legal and ethical issues. Such activities can be undertaken only when they align with Denver Health policies. Contact your supervisor or Enterprise Compliance Services to discuss specific situations.

Q: I was offered a \$500 gift certificate by a vendor to make sure that the vendor is selected to provide temporary staffing services to Denver Health. Am I permitted to accept that money?

A: No. It is not acceptable for team members to accept or receive any money for the purposes of influencing a decision.

Q: What if an appreciative patient or family member approaches me wanting to make a donation?

A: You should thank them and tell them to contact the Denver Health Foundation. If the individual insists on writing a check immediately, ask them to make it payable to the Denver Health Foundation. Give the check to your supervisor to forward to the Foundation. Under no circumstances may you accept cash or cash equivalents.

Comply with Anti-Kickback and Patient Referral Laws

In compliance with Medicare and Medicaid regulations, Denver Health does not offer valuable items or services, including writing off copays and co-insurance, to Medicare or Medicaid beneficiaries in order to attract their business.

We accept patient referrals and admissions based solely on the patient's medical needs and our ability to render the needed services. We do not pay or offer to pay anyone – team members, physicians, or other persons or entities – for the referral of patients.

No Denver Health team member or any other person acting on behalf of the organization is permitted to solicit or receive anything of value, directly or indirectly, in exchange for the referral of patients. Similarly, when making patient referrals to another health care provider, we do not take into account the volume or value of referrals that the provider has made (or may make) to Denver Health.

Federal and state laws and regulations govern the relationship between hospitals and physicians who may refer patients to their facilities. The applicable federal laws include the Anti-Kickback Statute and the Stark Law. It is important that those who interact with physicians – particularly regarding the payments to physicians for

services rendered, providing space or services to physicians, recruiting physicians to the organization, or arranging for physicians to serve in leadership positions in the operation – are aware of the requirements of the laws, regulations, and policies that address relationships between facilities and physicians.

Q & A

Q: I process expense reports for my department. I received a report showing the purchase of gifts totaling hundreds of dollars for one of the physicians who refers patients to us. Is this acceptable?

A: No. Any gift or other consideration worth more than nominal value may appear to be an inducement for referrals and is prohibited by law. You should report this finding to your supervisor, Enterprise Compliance Services, or the Denver Health ValuesLine.

Q: What should I do if a physician asks me to provide payment or compensation in exchange for referrals to Denver Health?

A: Requesting a “kickback” for referrals is illegal and entering into such an arrangement would subject Denver Health to substantial risk. You should promptly report the situation to your supervisor, Enterprise Compliance Services, or the Denver Health ValuesLine.



Political Activities

Denver Health believes that everyone should be an engaged citizen. We encourage all eligible individuals to vote and exercise that right. However, you may not support a candidate, ballot issue or potential or current legislation in any of the following ways:

- Implying you speak on behalf of Denver Health;
- Including the cost of a donation, a fund-raiser, a dinner, or any other transaction as an expense;
- Using or permitting the use of Denver Health space, assets, logo, or team members for political campaigning or lobbying; or
- Using Denver Health's email system to express personal political views.

The above limits regarding political activity do not apply if:

- Denver Health's CEO or Government Relations office asks you to visit a public official to discuss Denver Health's view on an industry issue; or
- Denver Health invites a well-known political person to one of its facilities to focus public attention on an important health care issue such as social disparities in healthcare.

The above limits regarding political activity does not prevent the Denver Health Board of Directors to take a position on issues or activities that they believe is in the best interests of Denver Health.

Refer to **Solicitation/Distribution**, and **Meeting Room Reservations for Internal and External Groups** for more information.

Q & A

Q: I understand that Denver Health does not endorse political candidates or parties. But why does Denver Health sometimes endorse ballot issues or other legislative efforts?

A: It is legal and appropriate for the Denver Health Board of Directors to show support for issues or efforts that promote positive outcomes for the health of the population, and to oppose efforts that do not.

Q: I perform volunteer work for a local candidate who is running for office. May I use the copy machine to make flyers?

A: No. You may not use Denver Health time or resources to support political activities.

Charitable Contributions

The Denver Health Foundation receives philanthropic gifts from private sources to support our charitable mission. Asking donors for such gifts must be done in accordance with applicable Denver Health policies.

Refer to **Gifts and Interactions with Vendors** and applicable Denver Health Foundation policies for more information.

COOPERATE WITH GOVERNMENT AUTHORITIES AND INQUIRIES

The health care industry is highly regulated and as a result, Denver Health receives unannounced visits and regular inquiries from local, state, and federal agencies, to which it must respond. All Denver Health team members must cooperate with government officials. If you are contacted by a governmental agency or representative in the course of your work duties or receive a subpoena or other legal document that is not addressed to you personally, your very first action – before doing anything else – is to immediately notify your direct supervisor, Enterprise Compliance Services, and/or the Office of General Counsel.

Denver Health team members should be honest and accurate when communicating with government agencies and coordinate with leadership. Responses should be coordinated with Compliance or Legal, as appropriate. Wrong or partial answers to questions may subject Denver Health to potential negative risks. Conversely, providing data when not required may breach a patient's right to privacy, and may expose Denver Health to negative risks. Denver Health team members must not hide, modify, or destroy documents; lie; or make false statements to government officials under any circumstance.

Refer to **Receipt of Subpoenas, Summons and Complaints** for more information.

Q & A

Q: What should I do if a government official asks to talk to me about the activities of my department?

A: You have the right to speak with a government official and Denver Health will not infringe upon this right. You should also notify your immediate supervisor, Enterprise Compliance Services, and/or the Office of General Counsel as soon as possible. You should also be aware that you may have the right to consult with a personal attorney before answering any questions.

PROTECT OUR REPUTATION

Marketing and Communications

Any marketing program developed and implemented by Denver Health to the community at large abides by Denver Health's ethical guidelines. Marketing programs reflect truth in advertising and are factually accurate. Denver Health may use marketing to: (1) inform the community about the availability and the value of our services and products and (2) inform the public of Denver Health's views on public policy issues related to health care. Marketing and advertisements that make health or safety claims must be supported by tests or studies approved by experts in the appropriate field.

All marketing and communications outreach is led by the Marketing and Communications Department. Denver Health departments and properties must obtain approval from the Marketing and Communications before creating or posting new marketing outreach materials, including department logos, blogs, websites, and social media accounts (see Social Media Terms of Use below).

All advertisements and other types of marketing must meet HIPAA and other government standards. To meet these standards, marketing and advertisements must: (1) tell the truth; (2) be informative; (3) not be misleading; and (4) not reveal confidential business or patient information.

To ensure that all marketing and advertising materials not only align with the Denver Health mission, values and goals, but also meet the requirements above, plan and coordinate your activities with the Marketing and Communications Department at Public_Relations@dhha.org or by calling the Denver Health Media Phone at **303-520-9591**.

Q & A

Q: Our department is putting together a program that we believe would be of interest to the community. Can I call the newspaper and give them the details?

A: No. All external or internal communications must be coordinated through the Marketing and Communications Department by emailing: Public_Relations@dhha.org.

Interactions with the Media

To avoid confusion and to represent the hospital with official messaging, Denver Health communicates with the media and community in a clear, unified voice. Per Denver Health policy, any media inquiries, or requests to interview, issue of press releases or use of company logos must be coordinated and staffed by a member of the Marketing and Communications. If you are contacted by a member of the media, please call the media relations team at **303-520-9591**.

Refer to **Release of Information to the Media** for more information.

Social Media and Website Terms of Use

Denver Health team members are expected to follow Denver Health social media site policies and procedures and act responsibly when posting information.

DENVER HEALTH SOCIAL MEDIA AND WEBSITE ACCOUNTS: CURRENT AND REQUESTS FOR NEW ACCOUNTS

- Denver Health team members are not allowed to independently create a Denver Health-branded social media account on any platform (Facebook, Twitter, Instagram, etc.) that acts to represent Denver Health, its departments/ properties, or its interests.
- New accounts may be allowed if representatives and/or team members with Denver Health departments and properties contact the Marketing and Communications to request approval before creating new official Denver Health- related social media and web site accounts.

PERSONAL SOCIAL MEDIA USE: RIGHTS AND RESPONSIBILITIES

- Posting patient information is a HIPAA violation and is strictly prohibited. This includes patient names (partial or full), descriptions of treatments or conditions, or patient photos (to include photos of a patient's face or a photo with patients in the background).
- Denver Health does not encourage you to "friend" or accept social media requests from any patient or family member of a patient. In the interest of personal privacy, Denver Health strongly cautions against contacting or connecting with patients on social media.
- Medical Staff are advised to be aware that offering medical advice via social media to a patient/potential patient in another state may constitute an unlicensed practice of medicine.
- Blogs, websites, wikis, chat rooms, and other forms of social media communications made by team members in an individual capacity are individual interactions, not official communications.
- Denver Health requests that users make clear, in some manner, that your views are personal. For example, it is best to include a disclaimer such as "The postings on this site are my own and do not necessarily reflect the views of Denver Health."

- When you use social media, use good judgment and be aware that all content, posts, and activity is public. We request that you be respectful of DHHA and our team members, customers, patients, partners, affiliates, and others. Avoid using statements, photographs, video, or audio that reasonably could be viewed as malicious, obscene, threatening or intimidating; that disparages DHHA or our team members, patients, customers, partners, and affiliates; or that might constitute harassment or bullying. Examples of such conduct might include: offensive posts meant to intentionally harm someone's reputation or posts that could contribute to a hostile work environment.
- Social networking sites are not the appropriate place to report concerns including, but not limited to, alleged discrimination, compliance, harassment, or safety issues. Concerns regarding these issues should be made directly to the Denver Health ValuesLine, your direct supervisor, Human Resources, or other means identified in Denver Health policies and procedures.
- If you are contacted by a member of the media to speak on behalf of Denver Health about a posting or comment you have made on a social networking site, your very first action – before doing anything else – is to direct them to Public_Relations@dhha.org or DenverHealthMedia@dhha.org.
- When using social media, team members may be subject to many aspects of this Code of Conduct, duty of confidentiality, Denver Health policies and procedures and/or Standards of Behavior. Consequently, we expect appropriate and professional behavior.

Refer to [Social Media Use](#), [Accountability Based Performance](#), and [Violence in the Workplace](#) Policies for more information.

Q & A

Q: I have developed many close relationships with my patients' family members and am friends with many of them on Facebook. If one of those "friends" asks me for medical advice via Facebook, is it okay for me to answer the question?

A: Team members should never give medical advice via social media. Encourage patients to contact their health care provider.

Q: Can I post a picture of a patient's body part or an image when the patient cannot be identified on my personal social media page?

A: No. You should not post any pictures of patients' body parts, patient images, etc., even if they are de-identified. This includes cell phone pictures of wounds, tattoos, birth marks, etc., as well as images such as X-rays, CT scans, etc.

PROTECT DENVER HEALTH ASSETS

Denver Health Time, Equipment, and Other Assets

Each Denver Health team member is responsible for preserving our organization's assets, which include but are not limited to time, materials, supplies, equipment, and information. As a general rule, Denver Health assets are to be used for business purposes only, largely for the benefit of Denver Health and its patients. Any questions about using Denver Health assets for other purposes must be addressed with your supervisor.

Disposal or sale of a Denver Health asset no longer being used must be handled by the Equipment Management Office within Materials Management, per Denver Health policy and procedures.

Refer to **Fixed Assets – Capitalization and Depreciation, Re-use, Re-deployment, and Disposition of Computing Equipment, Disposal of Capital Equipment Purchased with Sponsored Programs, Violence in the Workplace,** and **Accountability Based Performance** for more information.

Q & A

Q: If I see a team member intentionally misusing or managing Denver Health property, what should I do?

A: Every team member has an obligation to treat Denver Health property and equipment with care and respect. This includes reporting any damage or malfunction to appropriate personnel. If you are aware of anyone intentionally or negligently damaging property or equipment, report your observations to your supervisor, Enterprise Compliance Services, or via the Denver Health ValuesLine.

Physical Access to Denver Health Facilities

To protect the safety and security of our team members and patients, as well as Denver Health assets, while at work:

- Wear your identification at all times.
- If you see people without identification, offer to assist them in getting to their destination.

- If you see people without proper identification or without an escort in a restricted area:
 - Do not provide unauthorized people access to Denver Health facilities.
 - Offer to escort them to an appropriate area.
 - Get an authorized person to assist them.
 - Report them to security.

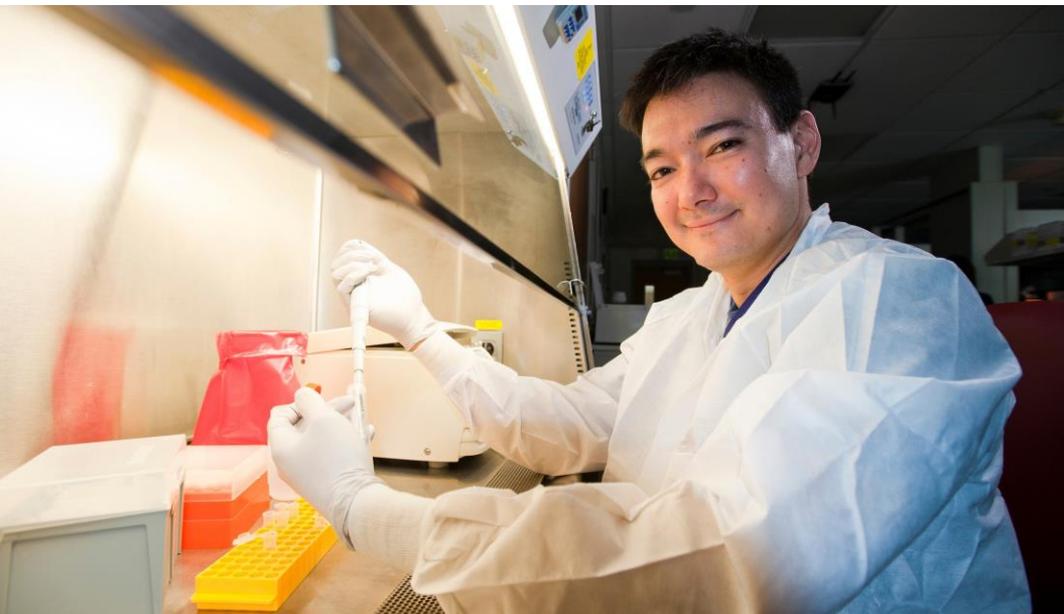
Refer to [Security Management Plan](#) and [Identification Badges](#) for more information.

Rights and Obligations Related to Intellectual Property

Any work of authorship, invention, or other creation produced by a Denver Health team member using company materials on company time is considered property of Denver Health, including any patent, trademark, copyright, trade secret, or other intellectual property right.

When you become a Denver Health team member, you agree that all works of authorship, invention, or other creation made solely or jointly with others using company materials on company time, are "works made-for-hire" as that term is defined in the United States Copyright Act of 1976, as amended.

Refer to [Intellectual Property](#) for more information.



Technology and Communication Systems

All communication systems including, but not limited to computers, electronic mail, the Denver Health Pulse, Internet access, company-provided telephones, and voice mail are the property of Denver Health and are to be used primarily for business purposes in accordance with electronic communications policies and procedures.

Limited, personal use of Denver Health communication systems is permitted, but users should assume communications are not private. Computer and telephone system users should have no expectation of privacy in anything they create, store, send, or receive, as Denver Health reserves the right to monitor and/or access communications usage and content consistent with Denver Health policies and procedures.

Team members who abuse our communication systems or use them excessively for non-business purposes may lose access privileges and be subject to disciplinary action.

Do not use Denver Health electronic media to transmit, retrieve or store any communication that is:

- Hostile, obscene or sexually explicit;
- Defamatory, threatening or illegal;
- Discriminatory or harassing;
- Religious or political; or
- A chain letter, a personal ad, or copyrighted data.

Team members must comply with Denver Health's information security policies and procedures governing the use of information systems. Team members may only use User IDs assigned to them individually and are not permitted to share or disclose any user account that is used to access Denver Health systems or information.

Refer to **Electronic Messaging-Email, Texting, and Mobile Photography Policy** for more information.

Q & A

Q: Things get hectic on the unit, especially during times of high census. We often use one password during the day, from one nurse. We do more looking than entering data into the system, so this is okay, right?

A: No. All team members should be using their own password to protect their identity in the system and ensure access is gained only to those areas needed to do their job. Team members must remember to log off or secure the electronic media record (data) and/or computer workstations when walking away.

HELP MAKE DENVER HEALTH THE BEST PLACE TO WORK

FOLLOW THE STANDARDS OF BEHAVIOR

Your behavior is critical to Denver Health fulfilling its mission, vision, and values. All Denver Health staff members are expected to have interpersonal interactions with patients, families, and co-workers that are professional, empathetic, and courteous in accordance with this Code of Conduct, Principles and Practices, and the Standards of Behavior.

The Denver Health values reflect what we believe is important in life and ultimately, help us to create the future we want. Understanding our values and explicitly acknowledging and celebrating them is critical.

Excellence - We are better everyday.

Compassion - We care for everyone.

Relentlessness - We fight for everyone.

Stewardship - We use resources responsibly.

Learning - We educate the next generation.

I AM COMMITTED TO HOLDING MYSELF ACCOUNTABLE TO DEMONSTRATE OUR VALUES BY:

- Respecting my patients and coworkers by striving to understand their culture and beliefs;
- Respecting patient privacy and confidentiality, especially in public areas;
- Always using AIDET (Acknowledge, Introduce, Duration, Explain, Thank) with patients, visitors, and coworkers;
- Being professional in my communication both electronically and in person;
- Washing my hands before and after each patient encounter;
- Being on time and ready to work at the start of my shift;
- Adhering to our dress code;
- Walking patients and visitors to the area they are looking for whenever possible;
- Educating others about the Standards of Behavior.

ADDITIONAL STANDARDS FOR LEADERS INCLUDE:

- Modeling the Standards of Behavior;
- Practicing rounding, sending thank you notes and observing my direct report's AIDET skills;

- Holding my direct reports accountable for their performance and Standards of Behavior;
- Learning and using LEAN tools for persistent adaptation, innovation, and cost reduction.

Refer to **Accountability Based Performance** for more information.

Q & A

Q: Why are the Standards of Behavior important?

A: We believe that trust, respect, and excellence are at the core of Denver Health's commitment to deliver quality patient care. The Standards of Behavior were developed to reflect Denver Health's commitment to teamwork, service, and communication. By making an official commitment to practice these standards, we reinforce them, acknowledge that they are expected behaviors and encourage Denver Health team members to practice them diligently.

MAINTAIN APPROPRIATE LICENSES AND CERTIFICATIONS

Team members, independent contractors, and care providers in positions which require professional licenses, certifications, or other credentials are responsible for maintaining the current status of their credentials and shall comply at all times with federal and state requirements applicable to their respective disciplines. To assure compliance, Denver Health reserves the right to require evidence of a current license or credential status.

Denver Health does not allow any team member, independent contractor, or care provider to work without valid, current licenses or credentials. Each individual must have evidence of current and valid licensure, certification, registration, accreditation, or credential as required by his or her position description.

Refer to **Maintaining Licensure, Certification, and/or Registration** for more information.

COMPLY WITH COPYRIGHT LAWS

Denver Health team members must comply with all copyright laws. No document, artwork, videotape, audiotape, photograph, or motion picture, including digital materials, which are protected by federal copyright law, are to be used or reproduced by any Denver Health team member without the written authorization of the copyright owner.

Refer to **Copyright Policy** for more information.

Q & A

Q: I found an article that I think would be helpful to other people in my department. Can I make a copy and pass it out to staff?

A: The "fair use" doctrine may allow you to make a copy of the article or publication for educational purposes. Before making a copy, check with the source regarding copyright permission. Most sources include a phone number to call. If you are still unsure, contact the Office of General Counsel.

VALUE DIVERSITY, EQUITY, AND INCLUSION

Denver Health promotes diversity in its workforce at all levels of our organization. We are committed to providing an inclusive environment where everyone is treated with fairness, dignity, and respect and feel that they belong. We are united by Denver Health's mission and values, and we celebrate our unique differences.

At Denver Health, we pride ourselves on our commitment to diversity. Equal opportunity is a fundamental principle of the organization. As an equal opportunity employer, we are committed to recruiting, hiring, and retaining a diverse staff reflective of the patients and communities we serve. We regard laws, regulations, and policies relating to diversity as the minimum standard.

In support of our equal employment opportunity principle, the Company has affirmative action plans for women, minorities, individuals with disabilities, and covered veterans.

Denver Health does not discriminate against any individual with regard to race, color, religion, sex, national origin, age, disability, sexual orientation, gender identity, gender expression, marital status, pregnancy, genetic information, or veteran status with respect to any offer, term or condition of employment. We make reasonable accommodations to the known physical and mental limitations of qualified individuals with disabilities.

Refer to **Equal Employment Opportunity** and **Workforce Diversity** for more information.

Q & A

Q: What is the best way to create an environment of inclusion for Denver Health team members of diverse ethnicities?

A: Some examples of ways to support inclusion of all races and ethnicities across the enterprise include:

- Being aware of, and sensitive to, cultural backgrounds, lives and interests of team members outside the workplace
- Working to build relationships through increased understanding and inclusion
- Ensuring all team members have the opportunity to take part in decision making and planning for social activities
- Acknowledging all faiths present in your workplace

CREATE A HARASSMENT-FREE WORKPLACE

Each Denver Health team member has the right to work in an environment free of harassment and violent behavior. We do not tolerate harassment of anyone based on his or her diverse characteristics or cultural backgrounds.

Sexual harassment is explicitly prohibited. This prohibition includes unwelcome sexual advances or requests for sexual favors. Furthermore, verbal, non-verbal, or physical conduct of a sexual nature that interferes with an individual's work performance or creates an intimidating, hostile, or offensive work environment is not tolerated at Denver Health. Violence or the threat of violence has no place in any Denver Health work location. Denver Health is committed to maintaining a work environment free of any form of violence or harassment. Team members who observe or experience any form of harassment or violence should immediately report the incident to their supervisor, the HR department, a member of management, or the Denver Health ValuesLine.

Denver Health reserves the right to respond to any actual or perceived acts of violence in a manner Denver Health sees fit according to the particular facts and circumstances.

Refer to **Violence in the Workplace** and **Discrimination and Harassment Prevention**.

FOSTER DENVER HEALTH'S COMMITMENT TO TRAINING AND COMMUNICATION

Denver Health has a strong commitment to the ongoing training and education of our team members. Comprehensive training and education has been developed to ensure that individuals throughout the organization are aware of the standards that apply to them. Code of Conduct training must be completed by Denver Health team members. Additional focused trainings may be required for some team members. Denver Health policies and procedures outline duty-specific training requirements.

Many available resources regarding our Enterprise Compliance Program can be accessed on the Denver Health Pulse and to the general public on the Denver Health website (www.DenverHealth.org). We strongly encourage all team members and affiliates to frequently visit both sites.

Refer to **Education and Training** for more information.

ADVOCATE ENVIRONMENTAL COMPLIANCE

It is Denver Health policy to comply with all environmental laws and regulations as they relate to our operations. We act to preserve our natural resources to the fullest extent reasonably possible. We comply with all environmental laws and operate each of our facilities with the necessary permits and approvals. As an organization, we employ the proper procedures to provide a good environment of care and to prevent pollution.

To help Denver Health comply with these laws and regulations, all Denver Health team members must understand how job duties may impact the environment, adhere to all requirements for the proper handling of hazardous materials, and immediately alert supervisors to any situation regarding the discharge of hazardous substances, improper disposal of hazardous and medical waste, or any situation which may be potentially damaging to the environment.

Refer to [Hazardous Materials and Waste Management Plan](#) for more information.

SUPPORT DENVER HEALTH'S SMOKE-FREE CAMPUS

To promote the health, well-being, and safety of our patients, visitors and team members, Denver Health is a smoke-free environment. Smoking (including the use of marijuana or e-cigarettes) and the use of any tobacco products is prohibited on all Denver Health properties including grounds, parking lots, parking structures and sidewalks within property boundaries. Denver Health team members should communicate this policy with courtesy to patients and visitors.

Refer to [Smoke and Tobacco-Free Environment](#) for more information.

KEEP DENVER HEALTH A DRUG AND ALCOHOL-FREE WORKPLACE

To protect the interests of our team members and patients, Denver Health is committed to an alcohol and drug-free work environment. All team members must report to work free from the influence of alcohol and/or drugs. Reporting to work under the influence of drugs or alcohol; or using, possessing, selling, distributing, or dispensing any alcohol, drugs, or drug paraphernalia while on Denver Health work time or property may result in immediate termination. We may use drug testing as a means of enforcing this policy.

Refer to [Drug and Alcohol-Free Workplace](#) for more information.

MAKE WORKPLACE HEALTH AND SAFETY A FOCUS

It is a priority at Denver Health to have a safe workplace for its team members. All Denver Health entities comply with all government rules and regulations and Denver Health policies that promote the protection of workplace health and safety. Denver Health team members must familiarize themselves with and understand the policies that apply to them in their specific job responsibilities, and to seek advice from their manager, supervisor, or the Safety Officer when a question or concern arises. All workplace injuries should be reported immediately to a manager or supervisor so actions to address the matter can be taken immediately.

Refer to [Patient, Visitor and Employee Safety Plan Policy](#) and the [Hazardous Materials and Waste Management Plan](#) for more information.

KNOW YOUR RESOURCES

Compliance is everyone's responsibility at Denver Health, and there are a lot of resources to help support and guide you in doing the right thing as you encounter challenging business situations or ethical dilemmas. These resources include:

- Your manager, supervisor, director, executive, or Chief Compliance and Audit Officer
- Enterprise Compliance Services, which includes Compliance and Internal Audit functions for DHHA and DHMP
- Human Resources Employee Relations Team
- Denver Health policies, procedures, guidelines, principles and practices
- Office of General Counsel
- The Denver Health ValuesLine at **1-800-273-8452** or <http://www.denverhealth.ethicspoint.com/>.

GET TO KNOW DENVER HEALTH'S ENTERPRISE COMPLIANCE SERVICES

The Denver Health Enterprise Compliance Services Department provides Internal Audit and Compliance functions for the organization. Enterprise Compliance Services supports and encourages a culture of ethical decision making to ensure operations align with laws, regulations, sub-regulatory guidance, policies, procedures, guidelines, and standards, and is a resource for all Denver Health team members

The Denver Health Enterprise Compliance Program is comprised of seven elements that include setting standards (e.g., the Code of Conduct, compliance policies and procedures), communicating the standards, providing a mechanism for reporting potential compliance and ethical concerns, monitoring and auditing compliance with regulatory requirements and financial internal controls, and maintaining an organizational structure that supports the furtherance of the compliance program. Each of these elements is detailed in the Denver Health Enterprise Compliance Program, which is available on the Denver Health Pulse Site and in PolicyStat. We encourage you to review these documents and become familiar with them.

Refer to the **Enterprise Compliance Program** for more information.





SPEAK UP

Denver Health is committed to maintaining, as appropriate, confidentiality and anonymity for all individuals reporting compliance issues in good faith. You are protected from retaliation and retribution for seeking guidance or reporting potential violations involving a compliance issue. All Denver Health team members are both empowered and required to report any known violation of law, regulation, the Code of Conduct, or Denver Health policies, procedures, principles, or practices. Knowing about a violation and not reporting it can lead to corrective action, up to and including termination. Additionally, intentionally making a false report is a serious violation of Denver Health policies and will result in corrective action.

Your immediate supervisor and other leaders within your area are expected and required to address compliance concerns reported to them. In the event a matter is not resolved, or you have other reservations about reporting the matter within your department, you can contact the Chief Compliance and Audit Officer or Enterprise Compliance Services by calling **303-602-7014** or by visiting our offices at 601 Broadway. You may also choose to contact the Denver Health ValuesLine by calling **1-800-273-8452** or completing a web report at <http://www.denverhealth.ethicspoint.com/>.

The ValuesLine is a great option to anonymously report a compliance or business ethics issue if you so choose. To assure you that your reports remain anonymous, we engage an outside firm to manage the ValuesLine. All calls are treated confidentially and are not traced. The operators are not Denver Health team members and are available to answer your call 24 hours a day. Likewise, the website used for web reports is an external site managed by an outside firm. When reporting a potential compliance issue, be prepared to provide detailed information as, without enough information, it may not be possible to properly investigate the matter.

Refer to **Non-Retaliation** and the **Enterprise Compliance Program** for more information.



THANK You

Thank you for your dedication to Denver Health and contributing to the mission, vision, and values of this great organization in all that you do. You play a critical role in sustaining our reputation and the trust we have built with each other, our patients, our members, and the community we serve. Thank you for reading, adopting, and living the **Code of Conduct** to support our culture of compliance and ethics and to further this organization as a wonderful place to work and receive care.

Find out more by visiting:

DenverHealth.org
PHIDenverHealth.org
DenverHealthFoundation.org
DenverHealthMedicalPlan.org



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