



ONE JEFFERSON. ONE CODE.

Code of Conduct & Ethical Behavior



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A Message from Leadership

Members of the Thomas Jefferson University and Jefferson Health* community (collectively referred to as “Jefferson”) share responsibility to maintain excellence and integrity in all we do. This shared responsibility forms the foundation of our *Code of Conduct and Ethical Behavior* (the “Code”).

As we reimagine and revolutionize healthcare and education, our commitment to integrity will intensify. Jefferson enjoys an unparalleled reputation for excellence because members of our community remain committed to the principles and standards embedded in this Code.

As Jefferson expands to include more organizations, our commitment to excellence and integrity will remain intact, and we will update our Code to ensure its continuing relevance to everyone within our organization.

We are counting on you to make a personal pledge of commitment to integrity and ethics. When you uphold our Code without exception, you are ensuring that Jefferson remains a center for excellent academic, clinical, innovative, and philanthropic activities.



Stephen K. Klasko, MD, MBA
President and CEO

A handwritten signature in blue ink, appearing to read "Stephen K. Klasko".



Richard W. Hevner
Chair of the Board of Trustees

A handwritten signature in blue ink, appearing to read "Richard W. Hevner".

* *Jefferson Health* includes Abington Hospital, Abington-Lansdale Hospital, Thomas Jefferson University Hospital, Jefferson Hospital for Neuroscience, and Methodist Hospital.

Mission, Vision, & Values

MISSION: OUR CORE PURPOSE.

Health is All We Do

VISION: OUR PATH FOR THE FUTURE.

To reimagine health, health education and discovery to create unparalleled value, and to be the most trusted healthcare partner.

VALUES: OUR BELIEFS AND BEHAVIORS.

Our Values guide us in everything we do at Jefferson, ensuring that we serve our patients and each other to the best of our abilities and create the foundation for achieving our goals as we transform Jefferson – and healthcare.

Responsibilities of All Members of the Jefferson Community

The Jefferson community includes members of the Board of Trustees, senior leadership, faculty, clinicians, researchers, administrators, employees, volunteers, contractors, and vendors. Since our Code represents Jefferson's official standards of conduct, we expect all members of the community to review, understand, and abide by it. The Code will not cover every situation you will encounter or every detail of our policies and rules, but the guidelines on these pages are mandatory.

RESPONSIBILITIES OF ALL MEMBERS OF THE JEFFERSON COMMUNITY

We must:

- Promote a culture of fairness, trust, and respect.
- Follow the Code at all times.
- Ask questions when we are unsure about what to do.
- Participate in training programs designed to help apply the Code in everyday decision-making.
- Speak up and report concerns about things we see or experience at Jefferson.

You can report concerns to your supervisor, a higher-level manager, or your local Compliance Office, Human Resources, or Office of Legal Counsel without fear of punishment or losing your job. At any time, you can use the Jefferson Alertline at 888-5-COMPLY (888-526-6759) or **Jefferson.Alertline.com** to report concerns or ask questions anonymously.



ADDITIONAL RESPONSIBILITIES OF LEADERS

Jefferson's leaders, including all people in supervisory positions, have an additional responsibility to:

- Respond appropriately when matters are brought to their attention.
- Set a personal example for high ethical standards in the performance of their duties.
- Clearly communicate expectations for high standards of ethical behavior and respect for all members of the Jefferson community.
- Apply the guidance set forth in our Code while supporting Jefferson's commitment to a fair and just culture.
- Encourage those they lead to ask questions and raise issues and concerns without fear of punishment.

Reporting Concerns

WHEN YOU SEE SOMETHING SAY SOMETHING

You do not have to be sure that you are right to raise concerns about potential violations of the Code, Jefferson's policies, laws, or regulations. Jefferson will investigate all good faith reports of possible misconduct.

WHERE TO FIND HELP

STEP 1: IMMEDIATE SUPERVISOR

Speaking with your immediate supervisor is usually the best place to get answers to your questions.

STEP 2: A HIGHER-LEVEL MANAGER OR LEADER

If your immediate supervisor cannot handle your concern, raise the issue with a higher-level manager or leader in your department.

STEP 3: HUMAN RESOURCES

Your local Human Resources professionals can assist you with workplace issues and concerns.

STEP 4: OFFICE OF LEGAL COUNSEL

Contact your local legal department when you need guidance about legal matters involving Jefferson.

STEP 5: COMPLIANCE OFFICE

Your local Compliance Officer is responsible for operation of Jefferson's compliance and integrity program. You can obtain compliance guidance and report concerns in person or through the Jefferson Alertline.

YOUR LOCAL COMPLIANCE OFFICER

Please refer to your local organization directory for information about your Compliance Officer.

LEGAL REQUIREMENTS

Under the Federal False Claims Act, you may report any suspected fraud against the government directly to a government agency. Pennsylvania statutes also make it a crime to submit false information on items and services. Violations of the state and federal laws are punishable by imprisonment and carry fines and penalties. Anyone with knowledge or suspicion of fraud, waste, or abuse or other wrongdoing has a responsibility to report it.

ANONYMOUS REPORTING: KEY FACTS ABOUT THE JEFFERSON ALERTLINE

You may report your concerns without giving your name or contact information by using Jefferson's Alertline.

- An outside company that is not related to Jefferson manages the Alertline 24 hours a day, seven days a week.
- You can call the Alertline at 888-5-COMPLY (888-526-6759) or file a report online at **Jefferson.Alertline.com**. The system does not record calls, trace reports, or use caller ID.
- If you decide not to provide your name and contact information, the system will assign you a report key, password, and a contact date. You can use your report key and password to track your complaint or provide follow-up information.
- Jefferson receives a report of your contact with the Alertline. Your local Compliance Officer will review the report and take appropriate action.

PROTECTION FOR GOOD FAITH REPORTING

Jefferson has a policy of zero tolerance for any form of retaliation, punishment, or negative action taken against those who report issues and concerns in good faith. You can find specific policies addressing protection for reporting good faith concerns in your local compliance manual and organizational policies.

Upholding Our Code of Conduct

Jefferson expects all members of the community to be honest and use good judgment.

The following behaviors represent potential violations of the Code:

- Knowingly authorizing or participating in a violation of federal, state, or local law and/or regulations.
- Leaders, supervisors, or managers failing to provide adequate supervision or display a lack of diligence in assuring compliance with laws, regulations, and policies, including our Code.
- Punishing individuals who report issues and concerns in good faith.
- Deliberately filing false reports of Code violations.
- Actions that are discriminatory or rise to the level of harassment.
- Intentional behaviors that put at risk the privacy and security of Protected Health Information, other confidential information, or private business information.

DISCIPLINARY ACTION

Violation of this Code may result in disciplinary action up to and including termination or dismissal. Jefferson will conduct a fair and reasonable assessment of behavior prior to initiating disciplinary actions. All members of the Jefferson community must cooperate with investigations of alleged violations of this Code and/or other organizational policies.



ADDITIONAL REPORTING INFORMATION

PATIENT CONCERNS

Patients have a right to file complaints and/or grievances about their care without fear of unfair treatment. You must direct patients with complaints or concerns to your local office of Patient and Family Experience and/or the manager of the department from which they received their clinical care. Honor patient requests for contact information to regulatory or other agencies such as the Joint Commission and the Pennsylvania Department of Health.

UNSAFE CONDITIONS

Immediately report to your supervisor all work-related injuries and illnesses, injuries to non-employees, damage to property resulting from Jefferson's business activities, and any unsafe conditions that you cannot immediately and safely correct.

Treat all Members of the Jefferson Community with Respect and Fairness

Members of the Jefferson community are expected to provide high-quality education, employment, and patient care experiences to all persons, regardless of sex, age, race, color, religion, creed, sexual preference or orientation, gender identity, marital status, pregnancy, national origin, ancestry, citizenship, military status, veteran status, handicap or disability or other protected characteristics.

Jefferson will not tolerate harassing or discriminatory conduct. We maintain an environment in which all members of our community are free to raise concerns about discrimination or harassment at the earliest possible time without fear of punishment or negative treatment.

Each person covered under the Code is expected to:

- Behave in a manner that encourages the spirit of cooperation, respect, and dignity among all members of the community;
- Promote and support an environment free from disruptive behavior and poor working relationships;
- Be professional and respectful in all communications; and
- Report discrimination, harassment, and other offensive behavior to your supervisor or other persons immediately.



GLOSSARY

DISCRIMINATION is any prohibited act or failure to act, based in whole or in part on a person's race, color, religion, sex, national origin, age, disability, or other protected characteristics that has a negative impact on privileges, benefits, working conditions, or results in unequal treatment of employees, applicants, students, patients, or other protected members of the Jefferson community.

HARASSMENT is unwelcome conduct that is based on race, color, religion, sex (including pregnancy), national origin, age (40 or older), disability, or genetic information. Harassment becomes unlawful when 1) enduring the offensive conduct becomes a condition of continued employment, or 2) the conduct is severe or frequent enough to create a work environment that a reasonable person would consider intimidating, hostile, or abusive.

Harassment may include:

- Verbal abuse or hostile behavior, such as insulting, teasing, or mocking another person or group;
- Offensive or inappropriate physical contact, comments, jokes, or advances;
- Physical assault or stalking;
- Displaying or e-mailing derogatory, demeaning, or hostile materials; and/or
- Repeated unreasonable actions intended to intimidate, degrade, or humiliate.



TEST YOUR UNDERSTANDING

Jack supervises Sally and Andy. He walks up to Sally and Andy while they are laughing in a conversation. Andy asks Sally to repeat a funny joke she just told. The joke involves three people of different religious backgrounds and Jack is nervous that it will become offensive. Before Sally says the punchline, he wonders if he should stop her.

GUIDANCE FROM OUR CODE

Even if Jack is not personally offended, he should stop Sally before she finishes the joke. Jack should remind Sally, Andy, and other members of his team that telling racial, sexual, or religious jokes or jokes about other protected groups can be very offensive and violates the Code. If you witness or experience a similar situation, it is important to speak up.

Exercise Honesty and Integrity

Honest business practices inspire respect for Jefferson's mission and build foundations of trust with colleagues, patients, students, customers, families, and every other individual and entity with whom Jefferson does business. To uphold Jefferson's reputation for excellence, we must exercise honesty and integrity in every communication and transaction. Exercising honesty and integrity includes, but is not limited to, honoring commitments, exceeding expectations, and providing quality services.

Jefferson encourages its community members to tell the truth in all situations. In fact, employees are encouraged to take ownership of their successes as well as instances in which they were unable to meet Jefferson's standards of excellence.

Members of Jefferson's community have the opportunity to demonstrate honesty and integrity every day. Exercising honesty and integrity when engaging in enterprise-related activities requires you to:

- Be candid, thorough, timely, and honest in all activities, including, but not limited to, investigations into enterprise-related affairs;
- Follow your local organization's record retention policy, and never destroy, alter, or conceal information related to investigations or litigation;
- Prepare accurate information and documents that represent the facts and true nature of all business transactions;
- Disclose relationships or interactions in accordance with your local organization's policies; and
- Be truthful when required to certify or attest to activities performed in your capacity as a Jefferson employee or agent.

If something does not feel right, then it might not be the right thing to do. Use the following guide when situations arise to assist you in acting with integrity:

- Would the decision be perceived as ethical and legal?
- Does it comply with our Code and enterprise policies?
- Does it support our mission, vision, and values?
- Would you be comfortable if the decision was published in the news?



GLOSSARY

HONESTY is what you say. Honesty is about telling the truth.

INTEGRITY is about what you do. Think of it as “doing the right thing when no one is watching.”



TEST YOUR UNDERSTANDING

George has worked on financial statements all week and still cannot get them to reflect the targeted results. He is confident that he could “massage the numbers” and his supervisor would never know the difference. What should he do?

GUIDANCE FROM OUR CODE

It is never permissible to “massage the numbers.” George should discuss the challenges with his supervisor and together they should prepare accurate and factual statements. Employees and leaders must always perform their duties in an honest and professional manner.

Maintain the Highest Standards of Patient Care

Jefferson provides high-quality, cost-effective, and compassionate care designed to meet each patient's medical needs. In upholding Jefferson's standards for quality patient care, you must treat every patient with respect and dignity. Jefferson does not tolerate discrimination based on age, race, ethnicity, religion, culture, language, physical or mental disability, socioeconomic status, sex, sexual orientation, gender identity or expression, source of payment for care, or other protected characteristics.

Whether you are directly involved in the delivery of patient care or serve in a supporting role, you are expected to:

- Commit to the safety of every patient, every time. Speak up when you see a quality or safety issue, and discuss mistakes with others so everyone can learn how to prevent future mistakes;
- Ensure patients who come to Jefferson for emergency treatment receive a medical screening examination and, if necessary, stabilizing treatment, regardless of their ability to pay;
- Respect each patient's right to make informed medical decisions about all aspects of his or her care. When you interact with patients, listen carefully, provide clear and complete explanations, and honor their decisions within the limits of the law and Jefferson's mission, vision, and values; and
- Honor each patient's right to complete or provide an **advance directive**. However, patients are not required to have an advance directive in order to receive care and treatment from our organization.

GLOSSARY

An **ADVANCE DIRECTIVE**, such as a living will or durable power of attorney for healthcare, is a document that expresses a patient's choices about the patient's future care or names someone to decide if the patient cannot speak for himself or herself.



TEST YOUR UNDERSTANDING

Jefferson is scheduled for a regulatory site visit. Various medical records are being reviewed by clinical personnel to determine whether appropriate patient care standards have been met. During the review, staff identify test results that may not have been reported to patients. The results would likely play a significant role in the clinical treatment choices of the patients. The team lead on the project wants to make sure that the patients receive their test results, but fears they may become upset when they learn about the delay. What should he do?

GUIDANCE FROM OUR CODE

The Code requires us to speak up when we identify a quality and safety issue. The team lead should quickly gather all of the facts concerning the possible delay in transmission of test results and present them to their immediate supervisor for discussion and development of an action plan. This situation requires review by a number of Jefferson departments and leaders to ensure that patient care takes priority and appropriate steps are followed to address fully the patient care issues that were uncovered.

Maintain Confidentiality of Information and Records

Jefferson expects you to exercise caution and discretion when handling **confidential information**. Jefferson's efforts to maintain confidentiality of information and records are governed by specific laws, such as the **Health Insurance Portability and Accountability Act (HIPAA)** and the **Family Educational Rights and Privacy Act (FERPA)**. It is important to understand what you must do to handle this information correctly.

Please refer to your local organization's relevant policies on confidentiality, HIPAA Privacy and Security, confidential records management, and other records retention.

Following specific policy requirements, Jefferson community members must:

- Know who is and is not permitted to access confidential or otherwise protected information;
- Prevent unauthorized disclosures of confidential information;
- Safeguard usernames and passwords;
- Access, use, and share only the minimum amount of patient and/or student information authorized to complete your job duties and responsibilities; and
- Never place confidential or protected information in regular trash bins.



TEST YOUR UNDERSTANDING

Everyone in the office received a memo from senior leaders about upcoming changes to the organization. Jack realizes he also received a confidential document attached. After asking his coworkers if they received an attachment with the memo, Jack learns that no one else received it. Jack's coworkers want him to send them the attachment. Should Jack allow them to see the attachment?

GUIDANCE FROM OUR CODE

Jack should tell his coworkers that he cannot share the attachment because it was not sent to them directly. He should also advise the sender that he received this confidential information. You are obligated to protect Jefferson's confidential and private information. Do not share confidential and/or protected health information unless authorized by Jefferson's policies or laws.

GLOSSARY

CONFIDENTIAL INFORMATION is information that you learn, create, or develop during your employment or other covered relationship with Jefferson. It includes information that is not generally known to the public about Jefferson, our affiliates, employees, patients, students, or other parties with whom Jefferson has a relationship and who have an expectation of confidentiality.

HEALTH RECORDS: The **HIPAA** Privacy and Security Rules provide federal protections for "individually identifiable health information" held by "covered entities" and their "business associates," and gives patients privacy rights with respect to that information. The Privacy Rule permits the disclosure of health information needed for patient care and other purposes.

Do you need more information? Always refer to your local organization's policies to understand how these rules affect your Jefferson activities. You may also visit the Office for Civil Rights website: <http://www.hhs.gov/ocr/privacy/index.html>

STUDENT RECORDS: **FERPA** is a Federal law that protects the privacy of education records. The law applies to all schools that receive funds under an applicable program of the U.S. Department of Education.

Do you want to learn more about FERPA? Always refer to your local organization's policies to understand how these rules affect your Jefferson activities. You may also visit the U.S. Department of Education website: <http://www2.ed.gov/policy/gen/guid/fpco/ferpa/index.html>

Avoid Conflicts of Interest and Maintain the Highest Standards of Business Ethics and Integrity

CONFLICTS OF INTEREST

We must avoid, to the extent possible, conduct that may lead the public to conclude that a member of Jefferson's community is using an official position to further personal or private business interests or the interests of family members.

To avoid actual or perceived **conflicts of interest** that may impact Jefferson's reputation and relationships, community members must follow the general guidelines contained in our Code.

- Fully disclose to the appropriate parties all personal relationships or interests that may affect clinical judgment, academic decisions, business transactions, or other decisions made for Jefferson **before** entering into negotiations or reaching conclusions regarding an actual or potential Jefferson transaction.
- Full disclosure of any real or perceived conflict will enable Jefferson's officials to recommend or take steps to reduce, manage, or eliminate conflicts of interest before they present increased risks to our reputation or not-for-profit status.

Jefferson's policies provide specific guidance on identifying and reporting actual or potential conflicts of interest. Visit your local organization's website and policy manuals to understand your obligations regarding avoidance and reporting of actual or potential conflicts of interest.

MAINTAINING LEGAL AND ETHICAL STANDARDS IN BUSINESS TRANSACTIONS

You must not improperly use information to which you have access to gain an unfair advantage over Jefferson's

competitors, vendors, or other persons or entities. Keep these general principles in mind when you conduct Jefferson's business:

- You must not accept, offer, or solicit bribes, kickbacks, or anything of value as a reward for patient referrals.
- Accept patient referrals and admissions based solely on the patient's clinical needs and our ability to provide the needed services.
- If you believe a relationship or interaction will give Jefferson an unfair business advantage, disclose the situation to the appropriate Jefferson representative and obtain guidance before you proceed.

If you are unsure about the activities in which you plan to engage, disclose the activity to your supervisor and obtain a written decision regarding your ability to participate in the activity while employed by Jefferson.



TEST YOUR UNDERSTANDING

Claire's job is to educate patients on their options for home health care. Her son recently became regional manager of XYZ Home Health Care and she really wants him to be successful. He will receive substantial incentives if he increases the number of patients referred to XYZ this fiscal year. In fact, he promises her an all-expenses paid vacation to Hawaii if she helps him boost referrals to XYZ. Claire does not disclose her son's relationship with XYZ to Jefferson or to the patients for whom she is arranging home health care, but she refers all of the patients on her home health care referral list to XYZ. Has she violated the Code of Conduct?

GUIDANCE FROM OUR CODE

Yes. Claire cannot accept anything of value as a reward for patient referrals. Referring patients to XYZ because she desires a financial benefit is a clear violation of the Code. She should have disclosed her family relationship to XYZ to her immediate supervisor and obtained guidance regarding making referrals to XYZ before she began to refer patients to the company.

GLOSSARY

A **CONFLICT OF INTEREST** exists when a person is in a position to receive a personal benefit from an action or decisions made while acting in their official position as a member of the Jefferson community.

Personal benefits may relate to salary, investments, stock ownership, royalties received, or other non-Jefferson activities. Your local organization's conflict of interest policy contains detailed descriptions of interests and benefits that may form the basis of a conflict of interest.

Uphold the Highest Standards of Academic and Research Integrity

ACADEMIC INTEGRITY

Jefferson expects all community members to maintain integrity in relationships and interactions connected to the educational process. All members of the Jefferson community must maintain respect for the intellectual efforts of others and be honest in their own work, words, and ideas.

RESEARCH INTEGRITY

All persons conducting research at or on behalf of Jefferson are obligated to:

- Be honest in proposing, conducting, and reporting research;
- Ensure the accuracy of research data and results, and acknowledge all contributors;
- Attend all required training sessions;
- Adhere to all ethical and legal obligations, contractual agreements, and Jefferson's policies;
- Protect the safety, dignity, and rights of patients involved in research projects and provide full explanations of all services that they receive;
- Identify actual or potential conflicts of interest, and disclose all required relationships according to policy;
- Obtain official approvals for research activities, as required; and
- Follow your local organization's policies regarding integrity of data collection and management, intellectual property rights, and ownership.

You must report all concerns regarding academic and research integrity to your supervisor, an appropriate Jefferson representative, or through the Jefferson Alertline.



TEST YOUR UNDERSTANDING

Jamie recently transferred into a position providing administrative support to an Assistant Professor. The Assistant Professor instructed Jamie to respond to journal editor inquiries using a specific list of experts who work in his field of research interest, but were not involved in the research project underlying his recently submitted application for publication.

Several weeks later, Jamie was asked to find an email in the Assistant Professor's personal email account. While he looks for the item, he sees emails addressed to the same experts that he transmitted to the journal editors. It appears that the Assistant Professor made up the names and rerouted the messages to his personal email account. What now?

GUIDANCE FROM OUR CODE

The Assistant Professor's actions appear inappropriate and should be investigated. Jamie must report what he observed to his immediate supervisor. If the Assistant Professor is his immediate supervisor, he must report the matter to the next-level supervisor. Alternatively, he may report his observations to his local Compliance Office, the Office of Legal Counsel, or through the Jefferson Alertline.

Maintain a Relationship of Integrity with Each Payer

You must verify that all requests for payment or reimbursement are for services that are reasonable, necessary, appropriate, and provided by properly qualified persons. Claims must be sent to **payers** in a timely manner, in the correct amount, and supported by appropriate documentation. To ensure compliance with laws and regulations, Jefferson prohibits coding and billing for services that are wrong, false, or fraudulent. All members of the Jefferson community, including vendors and contractors, involved in patient care, clinical trials, and/or revenue cycle activities such as coding and billing, must understand and carefully follow all applicable rules and regulations related to payment for healthcare-related services.

To uphold our principles of honesty and integrity, members of the Jefferson community shall not alter or falsify any information on any record or document. All records must be maintained and kept in accordance with Jefferson's policies and procedures.



TEST YOUR UNDERSTANDING

Stephanie thinks her department may be billing a health insurance company incorrectly. She mentions this concern to her manager. Stephanie's manager says they have always submitted claims in this way, the process is fine, and not to make trouble about it. Stephanie reads the insurance company's guidelines for payment for the services in question and realizes the manager is wrong. She does not want to make trouble, but feels this should be corrected and changed for future billings. What can she do?

GUIDANCE FROM OUR CODE

Stephanie already attempted to report her concerns to her immediate supervisor, so she should either report the matter to a higher-level manager in her department or directly to her local Compliance Office. If Stephanie is uncomfortable reporting her concern this way, she may choose to report it anonymously through the Jefferson Alertline.

GLOSSARY

A **PAYER** is any organization, public or private, that pays or insures health or medical expenses on behalf of beneficiaries. Payers include, but are not limited to, commercial insurance companies, Medicare, Medicaid, other Federal and state health care programs, individuals, and other third parties. Jefferson is committed to complying with all laws and regulations that apply to our organization in order to receive payment for patient care services.

Conduct Political Activity and Governmental Activity in Accordance with the Law

PARTICIPATING IN POLITICAL ELECTIONS

As a citizen, you have the right to participate in the political process. However, Jefferson must comply with the requirements of the Internal Revenue Service for tax-exempt status and other Federal and state laws that restrict the use of corporate funds and assets in connection with elections.

Jefferson, and individuals acting on behalf of Jefferson, may not:

- Participate or intervene in any political campaign for any candidate for public office;
- Participate in political activities, including making contributions of financial or non-financial resources; and/or
- Donate Jefferson funds, property, services, or other financial or non-financial resources to any political candidate or for any political activity.

RESPONDING TO GOVERNMENT INQUIRIES

If you receive an inquiry, visit, subpoena, or other legal document or communication from a governmental agency or judicial authority requesting information from, about, or on behalf of Jefferson, you must immediately contact your local Office of Legal Counsel to coordinate and ensure a timely and lawful response.

Members of the Jefferson community will act lawfully when involved in an official government inquiry, investigation, or other legal proceeding.

- Do not alter, destroy, conceal, or falsify documents related to an investigation;
- Do not attempt to influence the decisions of a government representative; and
- Follow the direction of Jefferson's legal counsel when handling documents (including electronic records) in your custody or control relating to a matter under review.



TEST YOUR UNDERSTANDING

Samantha is friends with a local government official. The official will vote on a zoning ordinance that could impact Jefferson. Should Samantha discuss the potential business impact to Jefferson with the official?

GUIDANCE FROM OUR CODE

The proposed ordinance could have a direct effect on Jefferson, so anything Samantha says to the official could be viewed as unlawful lobbying on behalf of Jefferson. You must obtain permission to talk to political officials – even close friends – about government decisions that can affect Jefferson.

Foster a Safe and Healthy Environment

Jefferson promotes an atmosphere of trust in which people are encouraged to speak up for and promote a culture of safety that benefits patients, staff, and the community.

PATIENT SAFETY

- Participate in patient safety and quality initiatives and take individual responsibility for identifying and reporting risks.
- Ensure services are provided by properly qualified individuals and are reasonable and necessary for the care of each patient.
- Document fully all patient care as required by law, regulation, payer requirements, and professional standards.

OCCUPATIONAL SAFETY

- Dispose of all medical waste, hazardous waste, and other products in accordance with applicable environmental laws and regulations.
- Stay informed of known potential hazards in the workplace. Jefferson will provide evaluation and treatment for any reported injury sustained while at work.
- Come to work mentally and physically fit for duty and remain fit while on duty. You may not use, possess, or be under the influence of alcohol or illegal drugs, nor any drugs that impair your ability to perform your work safely.

PERSONAL SAFETY

- Report expressed or implied threats or acts of violence, harassment, intimidation, and other disruptive or unsafe behavior in and around the workplace.
- Do not keep weapons of any kind on your person, on Jefferson's property, or while conducting Jefferson's business, regardless of whether you are licensed to carry the weapon. Possession of chemical sprays in small quantities for personal protection is not prohibited.

When you see something, say something. Reporting allows Jefferson the opportunity to correct system and process failures for the benefit of the community.



TEST YOUR UNDERSTANDING

Lisa notices that Karl has been acting strange lately. He seems to have excessive energy and not need much sleep. He sends emails at all hours of the night. She notices that he takes pills at work. Karl told her that they are vitamins but Lisa does not believe him. How should she handle her concern?

GUIDANCE FROM OUR CODE

It is against policy to use alcohol or illegal drugs while on duty at work. Lisa is aware of a potentially unsafe situation and is obligated to report it. If you suspect unsafe behaviors or witness unsafe practices by anyone at Jefferson, you must report it to a supervisor, Human Resources, the Security Department, or file a report through the Jefferson Alertline to start an investigation. Jefferson is committed to an environment that encourages members of the community to raise all safety-related issues without fear of punishment for a good faith report.

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Acknowledgement and Certification

ACKNOWLEDGEMENT PROCESS

All members of the Jefferson community are required to acknowledge their receipt and review of the *Code of Conduct and Ethical Behavior*, confirm they understand that the Code represents Jefferson's official standards of conduct, and agree to abide by it. New and existing colleagues are required to read and acknowledge the Code as a condition of employment and all are required to participate in training designed to reinforce awareness and understanding of the Code's requirements.

Support of the Code and participation in related training programs may be considered in decisions regarding hiring, promotion, and performance evaluation for all members of the Jefferson community.

I acknowledge that I have received and read a copy of the Jefferson *Code of Conduct and Ethical Behavior* and certify that I understand and agree to be bound by the following:

- I agree to discuss any questions or concerns with the Code with my supervisor or a higher-level manager.
- I will comply with the Code and any other policies established that apply to my role, duties, and responsibilities at Jefferson.
- It is my responsibility and obligation to report any issues or concerns regarding possible violation of the Code.
- I will cooperate in investigations.
- Jefferson will not punish or retaliate against me for making a report of issues and concerns in good faith.
- The Code contains standards of behavior I am expected to follow as a condition of my employment at Jefferson and it is not an employment contract. I understand the standards may be amended, modified, or clarified at any time and I that I will receive periodic updates as they may occur.



Together...

Together... we can build a successful organization. Together... we can ensure an outstanding reputation. Together... we can protect our values.

Your role on our team is to speak up if you know of or suspect any unethical behavior. Our role is to listen.



Safely report any violations or get more information by contacting the hotline.

Online:

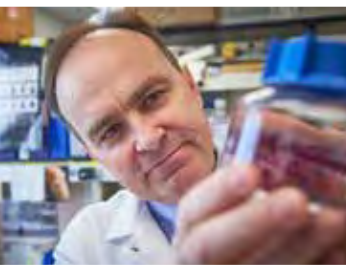
Jefferson.alertline.com

Phone:

1-888-5COMPLY (1-888-526-6759)

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