We strive to achieve excellence and maintain the highest ethical standards in the way we serve patients and conduct business, research, and education.
Dear Colleagues:

This Code of Conduct, “Integrity in Action,” presents the principles that guide our work at Duke University Health System (DUHS), Duke Connected Care (DCC), the Private Diagnostic Clinic PLLC (PDC), Duke University School of Medicine (SOM), and the School of Nursing (SON) (hereinafter “Duke Health”).

We strive to achieve excellence and maintain the highest ethical standards in the way that we serve our patients and conduct business, research, and education.

Our Code of Conduct and our Compliance Program provide the framework to ensure that these high standards of conduct are demonstrated consistently across our organization and that we live out our common mission, vision, and values on a daily basis.

Success in our mission to provide the very best of health care, medical education, and research depends upon the commitment of each one of us toward these shared ideals. By demonstrating integrity in every action we take, we will continue to earn the trust of our patients, the loyalty of our colleagues, and the respect of the communities we serve.

Sincerely,

Chancellor for Health Affairs, Duke University
President and CEO, Duke University Health System
INTRODUCTION

Within Duke Health, we have created a Compliance Program and a Code of Conduct, Integrity in Action, to show our commitment to doing things the right way. Here are some key points about our Compliance Program:

WHAT IS COMPLIANCE?

Compliance is doing the right thing by following the rules. It means we understand and comply with all the laws and policies that apply to our organization. We ask questions, report compliance concerns, and address issues.

WHO IS RESPONSIBLE FOR COMPLIANCE?

Every person here. This includes every employee, governing board member, administrator, physician, student, volunteer, as well as those with whom we do business.

WHAT DO I DO IF I THINK A LAW OR POLICY IS NOT BEING FOLLOWED?

You must report it. Every person is required to report suspected instances of Fraud, Waste and Abuse, as well as, noncompliance with laws or policies. You can:

- Contact your supervisor or other managers up the chain of command
- Contact your respective compliance officer. See the phone numbers for your contacts on the back of the Code of Conduct.
- Or if you want to report a concern anonymously, call the Integrity Line: 1-800-826-8109

WHAT WILL HAPPEN IF I REPORT A COMPLIANCE CONCERN?

The concern will be investigated and addressed appropriately. If you report a compliance concern in good faith, you are protected from retaliation or retribution. For reference see: DUHS policies on Non-Retaliation/Non-Retribution: egrc.duhs.duke.edu
INTEGRITY IN ACTION: CODE OF CONDUCT

for Duke Health
DUKE UNIVERSITY HEALTH SYSTEM
DUKE CONNECTED CARE
PRIVATE DIAGNOSTIC CLINIC PLLC
DUKE UNIVERSITY SCHOOL OF MEDICINE
DUKE UNIVERSITY SCHOOL OF NURSING
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THE CODE OF CONDUCT

The Code of Conduct is designed to provide you, a valued member of our organization, with a clear understanding of what is expected in the workplace. The Code applies to every employee, governing board member, member of the medical staff, DCC providers and staff, student, volunteer, as well as to those with whom we do business. This Code does not cover every situation. Instead, it provides broad guidelines that are detailed in each entity’s policies and procedures.

DUHS policies:
- Duke Health Policy Center
  (egr.c.duhs.duke.edu)

PDC policies:
- Private Diagnostic Clinic, PLLC
  (intranet.dm.duke.edu/ent/pdc)

Duke University policies:
(http://duke.edu/policies/)
WHICH LAWS AND REGULATIONS APPLY TO OUR WORK?

We strive to comply with the laws, regulations, standards, and policies that apply to Duke Health.

These address activities such as: (1) honoring patients’ rights; (2) maintaining and retaining records; (3) billing and coding for services; (4) providing quality of care; (5) negotiating and complying with all aspects of grants and contracts; (6) provide a work environment which promotes behaviors which are conducive to a culture of safety and consistent with the DUHS value based culture; (7) ensuring physicians are consistently exhibiting behaviors that support our important health system values; (8) protecting the health and safety of human and animal subjects in research; (9) complying with licenses and permits; (10) protecting the confidentiality of patient, business, and personal information; and (11) complying with all laws governing federal and state-funded health care programs and the requirements of insurance companies.

THE COMPLIANCE PROGRAM

Compliance is understanding your job responsibilities and following the rules and policies that apply to Duke Health. Our Compliance Program was created to make sure that our workforce is properly trained to follow all the laws, regulations, and policies that relate to our operations and to provide a way for the workforce to raise compliance concerns and ask questions.

DUHS, PDC, and Duke University have compliance officers that oversee our Compliance Programs. The DUHS, PDC, and Duke University compliance offices are responsible for facilitating: 1) delivery of compliance training to all of our workforce members, including employees, physicians, volunteers, vendors, and others within our organization; 2) monitoring activities to review business practices to make sure we comply with applicable laws, regulations, and policies; 3) responding to questions and concerns of staff; and 4) processes that assure compliance problems are reported and addressed.
These compliance offices answer questions about compliance issues and work with the Office of Counsel to respond to government inquiries. Entities within our organization also have individual facility compliance officers who work with the DUHS, PDC, and Duke University compliance offices to support compliance activities within his or her facility, division or school.

Each entity within Duke Health has a Compliance Committee that is responsible for: (1) implementing, maintaining, and improving the Compliance Program and this Code; (2) making sure we uphold the standards in this Code; and (3) making sure that people can report compliance concerns without fear of retribution or retaliation.
WHAT IF I THINK A LAW OR POLICY IS NOT BEING FOLLOWED?

You must report it. If employees, governing board members, members of the medical staff, students, volunteers, or vendors suspect that a law, regulation, policy, or this Code is being violated:

- Contact management or your supervisor about your concern or problem.
- If you feel uneasy talking to your supervisor, voice your concern to the next supervisory level, up to and including the highest level of management.
- You may also contact your facility compliance officer or the DUHS, PDC, or Duke University Compliance Officer. See their phone numbers on the back of the Code of Conduct.
- Call the Integrity Line at 1-800-826-8109 to report anonymously.

THE INTEGRITY LINE 1-800-826-8109

Sometimes you may wish to report a compliance concern anonymously and not through the normal chain of authority. In that case, report your concern through the Integrity Line: 1-800-826-8109.

Calls to the Integrity Line are not traced. Callers do not have to give their name; however, they may do so in order to provide additional information if needed. If callers do identify themselves, their confidentiality will be protected to the extent permitted by law.
WHAT WILL HAPPEN IF I REPORT A COMPLIANCE CONCERN?

Duke Health Compliance Offices evaluate all reports promptly, completely, and fairly. The respective office does not act on any report until it makes sure the report is valid.

- Duke Health Compliance Offices protect the confidentiality and other rights of all personnel, including anyone who is the subject of a compliance complaint.

- Anyone who violates applicable policies, laws, regulations, or this Code may be disciplined. People may also be disciplined if they do not report a compliance violation. Disciplinary action may include being terminated or having a contract revoked.

- You may ask the Compliance Office how your report was investigated and what the results were. The office will provide information to the extent permissible.

The Compliance Reporting Non-Retaliation and Non-Retribution Policy ensures that no one is penalized for reporting what he or she honestly believes is a compliance problem. However, if someone purposely falsifies or misrepresents a report of wrongdoing, — whether to protect him or herself or to hurt someone else, — that person will not be protected under this policy. DUHS policy can be found at: egrc.duhs.duke.edu

Duke University Statement of Ethical Principles and Code of Conduct can be found at: compliance.duke.edu
NON-RETALIATION/ NON-RETRIBUTION POLICY

- There will not be any retaliation as a result of reporting in good faith, regardless of whether or not a violation is found to have occurred.
- Retaliation is a violation of the Compliance Program and will not be tolerated and must be reported.
- Reports of retaliation will be investigated thoroughly and quickly and can result in disciplinary action, up to and including termination of employment.

DUHS policies can be found at: egrc.duhs.duke.edu
Duke University Statement of Ethical Principles and Code of Conduct can be found at: compliance.duke.edu
EXPECTATIONS FOR CONSULTANTS AND VENDORS

Consultants, service providers, vendors, and independent contractors ("vendors") are an integral part of Duke Health’s performance of its activities, and it is a priority of ours to ensure that vendors, along with us, participate in the Compliance Program and uphold the Code of Conduct, Duke Health policies, applicable laws and regulations, and Joint Commission standards when providing services to and for us. Vendors are required to participate in the Duke Health Compliance Program as demonstrated by vendors’ review and acknowledgment of the Code of Conduct. To ensure vendors’ participation, all vendor staff is required to register and complete the necessary training prior to entering one of our facilities. In accordance with the Conflict of Interest and Gifts and Courtesies policies, vendors are prohibited from providing gifts or courtesies, including entertainment, travel, food, business luncheons, mugs, pens, or any other marketing materials regardless of value. Duke Health provides all vendors with a copy of the Code of Conduct. We make relevant training and education programs available to vendors. It is required that vendors also abide by our Vendor Policy. Information regarding the policy and other visitation requirements is available at finance.duke.edu/procurement.
OUR RESPONSIBILITIES TOWARD OTHERS

Section 2
DUHS MISSION, VISION & VALUES

The culture at Duke Health is based on the DUHS Mission, Vision and Values.

**Mission**
As a world-class academic and healthcare system Duke Health strives to transform medicine and health locally and globally through innovative scientific research, rapid translation of breakthrough discoveries, future clinical and scientific leaders, advocating and practicing evidence-based medicine to improve community health, and leading efforts to eliminate health inequalities.

**Vision**
Duke Health seeks to transform health care, teaching, and to benefit society. We believe we can accomplish this vision by:

- Making important advances in biomedical science and fundamental research.
Fostering a multidisciplinary environment in the lab and clinic that unites our efforts to prevent illness, treat disease, and care for our patients.

Translating discoveries into clinical practice.

Designing clinical interventions and measuring their effectiveness.

Creating innovative approaches to health and wellness.

Addressing health disparities in our community and around the world.

Sharing our vision and advances globally through wide-reaching programs and collaborations.

Training the scientists, clinical professionals, administrators, and community advocates who will lead this work in the future.

Investing in technologies, tools, infrastructure, and people—the foundations of success.

Values

Core Value: Caring for our Patients, Their Loved Ones, and Each Other through:

Excellence: We strive to achieve excellence in all that we do.

Safety: We hold each other accountable to constantly improve a culture that ensures the safety and welfare of all patients, visitors, and staff.

Integrity: Our decisions, actions, and behaviors are based on honesty, trust, fairness, and the highest ethical standards.

Diversity: We embrace differences among people.

Teamwork: We have to depend on each other and work well together with mutual respect to achieve common goals.
PATIENT CARE AND PATIENTS’ RIGHTS

We are committed to treating patients with dignity and respect. Here are some specific ways:

- We provide our patients with safe, high-quality medical care without discrimination, which is compassionate and respects personal dignity, values, and beliefs.

- We provide clinical care to our patients without regard to an individual’s race, color, national origin, religion, gender, age, sexual orientation, gender identity, genetic information, veteran status or disability.

- We honor patients’ rights to participate in and make decisions about their care and pain management, including the right to refuse care when permitted by law.

- We provide our patients with information about their illness, treatment, pain, alternatives,
PATIENT CARE AND PATIENTS’ RIGHTS, continued

and outcomes in a manner they can understand. Interpretation services are provided when needed.

- We identify ourselves to our patients, giving our name and role as a health care provider (doctor, nurse, etc.).

- We advise our patients that they have the right to request a family member, friend, and/or physician be notified that they are under our care.

- We will not commit any act or omission, nor adopt any policy that inhibits our Medicare beneficiaries aligned with DCC from exercising their basic freedom of choice to obtain services from health care providers and entities.

- We ensure that our patients receive information about transfers to other facilities or organizations, including alternatives to transfer.

- We provide patients the opportunity to participate in research or decline to participate in research. Patients may decline to participate at any time
without compromising access to care, treatment, or services.

- We respect patients’ right to private and confidential treatment, communications, and medical records in accordance with all legal requirements.

- We welcome receipt of patient concerns and complaints so they can be addressed. Sharing concerns and complaints will not compromise a patient’s access to care, treatment, and services.

- We respect patients’ right to receive visitors, including but not limited to, spouse, domestic partner (including same sex partner), other family members, or friends.

Additional information on patients’ rights is available in DUHS Policies: Patient’s Rights and Responsibilities Policy, Interfacility Inpatient Transfers Policy, and Emergency Medical Treatment and Labor Act (EMTALA) Policy. (egrc.duhs.duke.edu)
INTERACTIONS WITH PHYSICIANS AND OTHER HEALTH CARE PROVIDERS

We strive to maintain the highest standards in accepting patient referrals and interacting with other providers.

- We abide by laws that relate to patient referrals.
- We make and accept patient referrals and consultations based on medical needs.
- We do not pay anyone or offer benefits to anyone for giving or asking for a referral or consultation.

- Our relationships with physicians comply with all applicable laws. If you have a question about relationships between DUHS, PDC, Duke University, and any referring/consulting physician, contact one of the Compliance Offices or the Office of Counsel, or review the DUHS Policies (egr.c.duhs.duke.edu) on Gifts and Courtesies and Compensated Physician Services Agreements.
THE WORK ENVIRONMENT

We make every effort to provide all employees and others at our organization with the best possible work environment.

- We follow all federal, state, and Equal Employment Opportunity Commission laws and regulations for recruiting and retaining qualified employees.
- We adhere to the Duke University Guiding Principles and Workforce Rules.
- We strive to resolve conflict through mediation and our dispute-resolution process.
- We cooperate with the respective Compliance Offices in the investigation of any allegations.
- We maintain a harassment-free work environment and conduct ourselves appropriately, treating each other with dignity and respect. Harassment is defined as the creation of any hostile or intimidating environment in which verbal or physical conduct is severe or persistent enough to cause significant interference.
with a staff member’s work, education, or on-site living condition. Harassment is not limited to conduct of a sexual nature. Duke also prohibits harassment based upon an individual’s race, color, national origin, religion, gender, age, sexual orientation, gender identity or expression, genetic information, veteran status, or disability.

- We report to work free of impairment from drugs and alcohol.
- We follow all laws, regulations, and policies related to environmental health and safety, including fire, chemical, biological, ergonomic, radiation, and electrical safety.
- We make sure that medical waste and hazardous materials are handled, transported, and disposed properly.
- We take reasonable steps to keep our workplace safe and avoid harming co-workers, patients, visitors, and ourselves through behaviors which are conducive to a culture of safety and consistent with the DUHS value based culture.
- We report all incidents and accidents according to department policies.
- We understand our responsibilities during emergency situations, including severe weather and disasters.
- We follow practices that reduce the spread of infection, such as washing hands, wearing personal protective equipment, and following isolation procedures.
- We store all drugs, pharmaceuticals, chemicals, and radioactive materials safely and maintain proper records.

For human resources policies including Duke University Guiding Principles and Workforce Rules, go to hr.duke.edu. For safety policies, go to safety.duke.edu.

We are committed to making sure that our employee hiring, screening, and disciplinary procedures and policies meet the requirements of the Compliance Program. We do not contract with, employ, or bill for services rendered by an individual or entity that is excluded from participating in federal health care programs, has been suspended or debarred from federal contracting, or has been convicted of a criminal offense related to the provision of health care.
We do not share information with others unless there is a legitimate need for others to know the information in order to perform their work.

We do not access the patient information of our colleagues, friends or family members without appropriate written authorization or when it is not part of our job responsibility.

Because so much of our information is generated and contained within our computer systems, we protect our computer systems and the information contained in them by creating a strong password, not sharing passwords, and by adhering to our information security policies and procedures.

When sending patient information electronically, we do so securely, using encryption as required by privacy and security policies.

We protect electronic patient information by ensuring we only use mobile devices that are properly encrypted such as encrypted laptops, thumb drives and other mobile devices.

We only use Duke’s shared network or approved secure cloud storage to store files containing PHI. For more details, go to security.duke.edu

We also take steps to maintain the confidentiality of:

- Information about personnel actions.
- Private financial, pricing, and cost information not of public record.
- Information regarding intellectual property (such as inventions) of the organization that is not intended for public disclosure and similar information of other entities that is shared with the organization on a confidential basis.
- Computer software programs.
- Service provider, vendor, or contractor information.
- We do not discuss sensitive topics involving business operations with any competitors, service providers, vendors, or other contractors without the approval of the appropriate supervisor.