



"Make my hospital right; make it the best."

Mrs. Abigail A. Geisinger

CODE OF CONDUCT

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CODE OF CONDUCT LETTER FROM DR. RYU

Geisinger

Geisinger Executive Office

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Each one of us plays an important role in Geisinger's purpose of caring for our patients, members, communities, and each other. That is true whether you provide direct patient care or serve in another important role.

As teammates united in our mission of improving the health of our communities, we are committed to performing our work ethically, legally and compassionately. Our Code of Conduct supports an environment of honesty, integrity and responsible behavior, and includes information and resources to help resolve issues regarding inappropriate conduct in the workplace. In essence, it guides us to treat one another as we would like to be treated ourselves.

Please review it carefully. Thank you for your continued dedication to doing what is right and making Geisinger the best for our patients, members, students and employees.

Sincerely,

Jaewon Ryu, MD, JD
Interim President & CEO



CODE OF CONDUCT

INTRODUCTION

At Geisinger, our Code of Conduct is a critical component of our overall compliance program. It provides guidance to employees and helps us carry out daily activities within appropriate ethical and legal standards. The Code of Conduct applies to every person who represents Geisinger: staff, providers, officers, Board members, volunteers, residents and students, and many contractors. We all work together toward a common Mission— to improve the health of our members, our patients and the community. **It is important that we all use the same guide — this Code of Conduct — to accomplish that Mission.**

We expect that all of us will behave according to this Code of Conduct. We want and need to hear about suspected violations of the Code of Conduct or other irregularities. We also want and need you to ask questions if you don't know what to do or how to act. There are several ways you can raise your questions or voice your concerns:

- Talk to your immediate supervisor or Human Resources representative
- Contact the Corporate Compliance Officer or members of the Legal Services Department.
- Call the **Corporate Compliance Hotline – 1-800-292-1627** or make a report on-line at **www.geisinger.org/alertline**.

You will see these resources listed throughout the Code of Conduct. Also, there are other places you can bring your questions and concerns, depending on the nature of the issue. Those additional resources are referenced in the Code of Conduct, too.

There are two main sections in the Code of Conduct.

1. **Geisinger's Standards of Conduct** describes how we do our work and how we relate to each other in the workplace. In this section you will learn about Geisinger's expectations in particular situations so that we always deal with our patients, members, regulators, communities and each other with integrity.
2. **Geisinger's Corporate Compliance Program** is designed to support a culture of integrity at Geisinger. In this section you will learn how the Corporate Compliance Program works, how to raise concerns about organizational and individual conduct and how each of us can create and maintain successful relationships built on integrity.

SECTION 1

STANDARDS OF CONDUCT

“Integrity” is defined as an “adherence to moral and ethical principles.” In this section, we discuss how integrity is critical to Geisinger’s continued success.

The Standards of Conduct are divided into four parts:

1. [Integrity in Our Business Relationships](#)
2. [Integrity in Our Community Relationships](#)
3. [Integrity in Our Care and Service Relationships](#)
4. [Integrity in Our Workplace Relationships](#)

Integrity in Our Business Relationships

Geisinger is recognized as a national leader in health care. As a leader, Geisinger relies on, and must continually demonstrate, that we conduct our business relationships with personal and professional integrity. We must all follow the legal, professional, personal and ethical standards that are described in the following sections.

[Billing, Coding and Documentation](#)

[Business Confidentiality](#)

[Conflicts of Interest](#)

[Contracting, Procurement and Purchasing](#)

[Entertainment, Gifts and Favors](#)

[Fair Competition and Antitrust Laws](#)

[Outside Employment and Consulting Arrangements](#)

[Recruiting and Compensation](#)

[Referrals of Care and Service](#)

Integrity in Our Business Relationships

BILLING, CODING AND DOCUMENTATION

Geisinger is committed to complying with all state and federal laws and third-party payor requirements that govern billing, coding, documenting and submitting claims for payment and cost reports. These laws and requirements are intended to prevent health care fraud and false claims. Claims for the services we provide or bill for must be supported by documentation that is:

- Accurate
- Timely
- Legible
- Accessible

All information supporting claims and cost reports must be appropriate and consistent with Geisinger's policies and procedures. Employees must be sure services performed are properly documented and billing codes are accurate. We make only truthful statements when representing or making claims for services. Due to the complex nature of reimbursement rules, those of us who are involved in delivering health care are expected to participate in and cooperate with education and monitoring activities related to billing, coding and documentation.

Relevant Policies & Procedures:

[Corporate Compliance Policy No. 04.400 – False Claims Act Education](#)

What exactly is a “false claim?”

“False claim” can be defined in several ways, but it basically means this: If a provider or plan is asking for — or planning to keep — payment from the government that it knows it is not entitled to, then it most likely is a false claims situation. There are many examples of situations that can lead to a “false claim,” but some of the most commonly reported are:

- Making duplicate claims for services
- Up-coding to more complex procedures
- Billing for services that were not provided
- Billing for services that were not medically necessary
- Billing for services of professionals who were not present
- Inappropriate bundling and unbundling of claims
- Falsely certifying compliance and other conditions of payment

Integrity in Our Business Relationships

BUSINESS CONFIDENTIALITY

Health care is extremely competitive; our success depends in part on the unique nature of our programs, systems and information. Geisinger's proprietary and business information must be kept confidential.

This means that you must never share confidential business information with anyone – even friends and family members. There may also be times that you will even be asked to limit the information you share with people who work here at Geisinger. Accuracy is very important to our work at Geisinger. Paying strict attention to detail ensures that business sensitive information and protected health information in the form of records, mailings and other documentation is both accurate and complete.

If you are unsure if you should be sharing information related to Geisinger with others, either within or outside the organization, ask your supervisor or contact the System's Corporate Compliance Officer. It is very important that we all protect the confidentiality of vital business information.

Relevant Policies and Procedures:

[Human Resource Policy No. 04.360 – Protection of Confidential Information & Sanctions](#)

[Human Resource Policy No. 04.380 – Electronic Communications and Computing](#)

[Legal Services Policy No. 14.2 – Copyright Policy](#)

[Information Security Office Policies & Procedures](#)

What kinds of business information must be kept confidential?

Proprietary and confidential information includes non-public information related to:

- Pricing and costs
- Acquisitions, divestitures and other strategic relationships
- Business and marketing plans
- Clinic service or expansion plans
- Staffing level plans
- Employee and customer lists
- Financial information
- Research and quality data
- Product/program planning
- Privileged information, such as attorney-client communications or peer review information, and
- Many other things that are important to the organization and our strategic or competitive position

Integrity in Our Business Relationships

CONFLICTS OF INTEREST

Conflicts of interest may occur if personal activities or interests would influence your ability to make decisions that are in the best interests of Geisinger. As a representative of Geisinger, you have a duty to act solely in the best interests of the organization, its patients and members. This means that you should not engage in activities that result in gain or profit for yourself or others at the expense of the organization, or that interfere with your work duties or judgment.

The test for whether there is a conflict of interest is an objective test; that is, whether a conflict exists “in the eyes of a reasonable person,” not whether you think there might be a conflict. Geisinger currently maintains two separate [Conflict of Interest Policies](#): (1) one applicable to directors, officers and senior leaders and (2) one applicable to all other employees. Geisinger also distributes an annual duality of interest questionnaire to certain employees to identify potential conflicts. If you do not routinely receive this questionnaire, or if a new potential conflict arises after you complete this questionnaire, please disclose these potential conflicts of interest to your supervisor or the [Legal Department](#).

Geisinger is legally obligated to protect its property and ensure its facilities and equipment are used appropriately. Resources such as materials, equipment, time and space should be used only for your work, unless your supervisor has specifically made an exception according to company policy.

What’s a “conflict of interest?”

It’s important to look at the facts and circumstances in order to decide if something is a conflict. A friendship with someone who works for a competitor is fine, but you should avoid talking about Geisinger with them, so that you don’t inadvertently disclose confidential information or put yourself or the organization in an inappropriate, or even illegal, situation. Some activities *automatically* create a conflict — such as being on the board of a competitor — while other activities may raise the *possibility* of a conflict — such as having a financial relationship with a competitor or vendor. That’s why it’s important to let your supervisor know if you are involved in any activities that may even just raise that possibility. Even the appearance of a conflict may have negative effects on both you and the organization.

Integrity in Our Business Relationships

CONTRACTING, PROCUREMENT AND PURCHASING

Our goal is to buy quality goods and services through an objective selection process. This process includes several protections:

- We make purchasing decisions based on objective criteria such as price, quality, technical expertise, timely delivery, service standards and adequate supply.
- Contractors and vendors are expected to comply with Geisinger policies.
- We do not do business with individuals and organizations that have been excluded from or sanctioned under federal health care programs or other federal contracts, or who have other restrictions on their eligibility to work with government contractors. Therefore, Geisinger Clinic and home health nurse employment applications, Geisinger Medical Center and Geisinger Wyoming Valley Medical Center medical staff applications, and Geisinger Health Plan empanelment applications include an inquiry as to whether the applicant has been excluded from participation in reimbursement programs, or disqualified or sanctioned as a government contractor. Our Supply Chain, Professional Revenue and Reimbursement, Credentialing, Pharmacy, and Community Health Services Departments routinely review the list of excluded individuals in our region to assure that we do not inadvertently contract with or employ someone who has been excluded from participation in a government program. If you learn that someone with whom we do business is excluded, please call the Compliance Hotline – **1-800-292-1627** or **make a report online at www.geisinger.org/alertline**.
- People who make purchasing and contracting decisions on behalf of Geisinger should follow **Supply Chain's Conflict of Interest Policy**. Anyone involved in such a decision must act with integrity in negotiating and awarding contracts in all purchasing and service transactions. These decisions must be based on objective criteria and not on personal relationships or friendships.
- We are also committed to ensuring that we meet appropriate diversity supplier standards in our purchasing practices.

All contracting and purchasing activities must comply with the organization's contracting policy. That policy and a [contract process](#) checklist are available on the [Contract Administration](#) internal website.

Integrity in Our Business Relationships

ENTERTAINMENT, GIFTS AND FAVORS

Occasionally we might be offered gifts or other tokens of appreciation from vendors, members, patients, their families, customers, competitors and others. In many industries, entertaining customers and exchanging gifts are customary practices, but in health care, we are in a unique position of trust. Our patients and members need to know that the work we do is not inappropriately influenced by gifts and other offers from the people with whom we do business.

With the exception of donations to Geisinger for purposes of patient care, research or provider education, Geisinger has adopted a “no-gift” policy. The receipt of gifts, gratuities or the sponsoring of entertainment from those seeking to influence business decisions of Geisinger should be politely declined. You should recognize that even if you believe that the acceptance of such a gift, gratuity, or participation in entertainment will not influence your decision, the person making the gesture may have the perception that the action will have such influence.

Courtesies such as meals, beverages, and/or other entertainment should be scrutinized. When meals or refreshments are provided as part of a business meeting or part of an agenda at a third party, accredited professional meeting where continuing education credit is awarded, and where it is normal business courtesy to accept the meal or refreshment, it is permissible. Where entertainment is provided, as an adjunct to a business meeting or accredited professional gathering as described above, and the value of the entertainment does not exceed a nominal value (\$85 per Person), participation is permissible. These exceptions do not permit any gifts or other benefits that are understood to be offered or provided as an inducement to refer business or as a reward for such referrals.

Geisinger has developed a Vendor Relationship Policy to help you answer questions about entertainment, gifts and other items you may be considering. The Policy contains these basic rules, lists third party interactions that are permissible (and not permissible) and describes a decision-making process you should use each time you are considering an offer from a third party or making an offer to a third party. You can find the [Geisinger Vendor Relationship Policy](#) on the INFOweb. When Geisinger acts as a vendor selling goods and services that are reimbursable under Medicare or Medicaid, Geisinger employees and professionals should adhere to the PhRMA Code (Pharmaceutical Research and Manufacturers of America) recommendations. Geisinger has enacted policies in line with PhRMA Code elements to guide personnel in areas including, but not limited to, sponsorships of continuing medical education events; limits in the provision of food and beverages; donations to scholarships and educational funds; consulting; and prohibitions on the provision of non-educational and practice-related items. Employees are encouraged and advised to review this policy to the extent they engage in marketing activities with individuals and entities outside of the health system.

If you have any doubt about whether it would be appropriate to accept or give a gift, entertainment offer, meal or other item or service, you must consult with your supervisor or the Legal Department.

Integrity in Our Business Relationships

FAIR COMPETITION AND ANTITRUST LAWS

At Geisinger we believe that a healthy competitive marketplace is good for patients and members. Antitrust laws are designed to encourage fair trade and competition in the marketplace. We will not behave in a way that is anti-competitive or violates antitrust laws.

All Geisinger employees must comply with applicable antitrust laws and other similar laws which regulate competition. Examples of conduct prohibited by such laws include (a) agreements to fix prices, bid rigging, or collusion with competitors (including price sharing); (b) boycotts, certain exclusive dealings, and price discrimination agreements; and (c) unfair trade practices, including bribery, misappropriation or trade secrets, deception, intimidation and similar unfair practices.

Whenever we are considering entering into an arrangement with another organization or person in the same line of business that we are in — be it health plan, hospital, care delivery or clinical research — it is important to consult with the [Legal Department](#) to make sure that the arrangement complies with applicable antitrust laws. Geisinger employees are expected to seek advice from our Legal Department when confronted with business decisions involving a risk of violation of antitrust laws or other similar laws.

Trade group and professional association activities can sometimes raise antitrust issues too, so talk with the [Legal Department](#) if potential competitive issues arise in those situations.

Integrity in Our Business Relationships

OUTSIDE EMPLOYMENT AND CONSULTING ARRANGEMENTS

If you are asked to provide services on a consulting basis for someone outside Geisinger, please consult your supervisor. Geisinger has policies regarding secondary employment and contracting for services to assist in determining how these arrangements should be handled. In general, if the consulting engagement can be performed outside of your regularly scheduled work hours or during your vacation time and without using Geisinger resources, you may contract to provide the services (if agreed to by your supervisor and it does not present a conflict of interest). However, if the work is to be performed during your regularly scheduled working hours and you need Geisinger resources to accomplish the project, then you may need to arrange for the Geisinger entity that employs you to contract to provide the services.

Many physicians are asked by companies who are developing new products to represent Geisinger or their chosen specialty. Such consultations require a minimum of some form of confidentiality agreement. Other types of programs that may be sponsored by external organizations include the presentation of medical treatment and technical development innovations to a panel of consultants. Please evaluate why you are being asked to serve as a consultant. If you believe that your participation is sought by virtue of the authority or influence you may exercise to direct an organizational decision that may benefit the sponsor, you should decline participation. If the request to serve as a consultant is based upon the work you do at Geisinger, you may retain honoraria up to a maximum total of \$10,000 per person per year, provided you obtain prior approval from your Department Director and Assistant Chief Medical Officer if you are a physician, or from the Executive Vice President overseeing your area if you are a non-physician professional. In addition you will be required to complete an application form attesting that in accepting the honoraria you are adhering to the System's applicable [Conflict of Interest Policy](#) and its Code of Conduct. You may also accept travel and lodging and/or be reimbursed for other out-of-pocket travel expenses on your own behalf. If Geisinger has paid for these expenses, then the reimbursement should be paid to Geisinger. If your spouse or family member travels with you, their expenses should be borne by you. This is consistent with [Geisinger's policy that relates to business travel](#).

Geisinger professionals and other employees may be invited to seminars or other professional education activities as a panel member, speaker or research presenter. Commercial supporters of such activities must not control the planning, content or execution of the professional activity. It may be customary for the meeting sponsor to pay for registration and lodging. If you are considered a faculty member of the educational event, it is permissible to accept the subsidy for yourself. However, it is not permissible to accept the cost of travel or registration on behalf of family members (unless they have qualified as faculty in their own right). This is consistent with [Geisinger's travel policy](#).

Relevant Policies and Procedures:

[Travel & Reimbursement Manual Policy No. 01.101 -- Honorariums/Professional Activities/Consulting](#)

Integrity in Our Business Relationships

RECRUITING AND COMPENSATION

There are special laws that relate to recruiting and compensating our employees, especially physicians and executives. Those laws are the [Antikickback](#), [Stark](#) and [tax](#) laws we discuss in other places in this Code of Conduct. Our recruiting and compensation activities must adhere to Geisinger's requirements, which include:

- Compensation and recruiting packages must be at fair market value
- Compensation and recruiting packages must not include incentives to induce patient referrals
- Executive compensation must be established in accordance with board-approved processes
- The [Legal Department](#) should review any unique recruitment or compensation packages.

Integrity in Our Business Relationships

REFERRALS OF CARE AND SERVICE

There are several laws that regulate patient and member referrals to other providers, facilities, suppliers and plans. These laws, some of which are known as the Antikickback, Stark and Patient Freedom of Choice laws, are complicated, so it is important to consult with the [Legal Department](#) if you are considering an arrangement that might impact patient or member referral patterns. Here are some general rules relating to referrals of patients and members:

- We are prohibited from soliciting, accepting or offering anything of value in exchange for patient or member referrals. Geisinger prohibits its employees, contractors, agents, and other representatives from offering, requesting, or receiving any direct or indirect payment because these payments would suggest that Geisinger is seeking preferential treatment or is paying a reward for referrals or other business. Direct payments might include any commission, rebate, bribe, or kickback. Indirect payments may be of a financial nature; they may include anything of value, such as the use of Geisinger property, services, or personnel as well as expensive gifts or exorbitant entertainment.
- Clinicians may not refer patients to other providers or facilities *outside of Geisinger* with which the provider or his or her family has a financial relationship.
- Members and patients who need a referral outside the organization should generally be given a list of various providers, facilities, or suppliers who can meet their particular needs and situations. Service decisions must be based on each patient's clinical requirements, our ability to meet the patient's needs, and/or the patient's choice of provider or location.
- No action that would otherwise be suspect is permissible merely because it appears to be customary in a particular location or a particular area of business activity.
- It is important that referral relationships be clearly defined and in writing. [Contract Administration](#) can assist in the documenting of these arrangements.

What are inappropriate "arrangements that might impact referrals?"

Here are a few examples:

- A hospital providing free or discounted space or equipment to a physician to encourage the physician to admit patients to its facility.
- A pharmacy routinely waiving copays or coinsurance to give customers an incentive to get prescriptions filled there.
- A supplier giving gifts to clinic employees as a "thank you" for increasing their supply orders.

Integrity in Our Community Relationships

Creating successful relationships throughout the community has been a vital part of Geisinger's success. As a nonprofit organization in a highly regulated industry, and as good stewards of limited health care resources, we act with integrity in our dealings with regulators, public officials and candidates, funders and the community. The following standards are critical to upholding our community commitments.

[Environmental Stewardship](#)

[Financial Reporting](#)

[Fraud, Waste and Abuse](#)

[Fundraising, Contributions and Solicitations](#)

[Health Plan Operations](#)

[Political Contributions and Policy Advocacy](#)

[Record-Keeping, Record Retention and Record Destruction](#)

[Research and Funding](#)

[Tax-Exempt and Nonprofit Status](#)

[Truthfulness and Cooperation](#)

Integrity in Our Community Relationships

ENVIRONMENTAL STEWARDSHIP

Geisinger is committed to responsible, safe disposal of waste products. Geisinger strives to comply with laws governing the handling of waste and hazardous materials — including storage, treatment, incineration, disposal and discharge — and other environmental safety requirements. We expect employees and providers to follow all [safety and industrial hygiene](#), waste management and environmental guidelines adopted by the organization.

Relevant Policies and Procedures:

[Geisinger Safety Manual \(GMC/GWV\)](#)

[Community Practice Service Line \(CPSL\)](#)

FINANCIAL REPORTING

Geisinger is committed to fair, accurate, complete and timely financial and other data reporting. Our statements about significant financial and other data reporting matters must be made fully and truthfully. We must not be misleading to others receiving or using that information. Geisinger's officers and management must maintain a system of internal controls designed to provide reasonable assurance that the organization meets financial and other data reporting obligations and objectives.

The Finance Department reports costs under generally accepted accounting principles and as provided for by Geisinger policy. Expenses are reported on a timely basis, with proper authority and documentation, through a prescribed process. Sometimes estimates must be made for financial reporting and it is incumbent upon everyone within the System to use the best possible estimate regardless of the impact on other results or measures.

Integrity in Our Community Relationships

FRAUD, WASTE AND ABUSE

Geisinger is committed to preventing, detecting and correcting fraud, waste and abuse related to health care benefits, regardless of whether those benefits are paid by a commercial health plan, an employer or the government. Whether you are a provider of health care, researcher or work mainly with Geisinger's health plan, you are responsible for reporting suspected health care fraud to any of the following resources:

- Your supervisor or HR Representative
- The Corporate Compliance Officer
- The Fraud Hotline (**1-800-292-1627**)
- **Online at www.geisinger.org/alertline**

Geisinger periodically assesses the risk that illegal conduct might occur, whether in its own facilities or by subcontractors or network providers. These assessments include claims reviews, medical record audits, member and patient satisfaction surveys, provider billing patterns, and other auditing, monitoring and outreach techniques.

Geisinger works to comply with all laws requiring the reporting of suspected fraud, waste and abuse to state and federal authorities. If you are involved in the provision of care or in the administration of care or government sponsored plans, you will be required to participate in periodic training to help prevent, identify, report and correct practices that may be fraudulent, wasteful or abusive.

What is fraud?

Fraud is when a person lies (or ignores the truth) in a way that could result in an unauthorized benefit to him/herself or to another person. The most frequent kind of health care fraud occurs when a person makes a false statement claiming they are entitled to payment under a state or federal health care program, such as Medicare. Unfortunately, there have been many instances of fraud in the health care industry, both large-scale and small-scale. Health care fraud could be committed by providers, facilities, plans, suppliers and members/beneficiaries, and costs the government, taxpayers, employers and health plans billions of dollars every year. Geisinger is committed to working with state and federal authorities to help combat health care fraud.

Integrity in Our Community Relationships

FUNDRAISING, CONTRIBUTIONS AND SOLICITATIONS

Charitable fundraising events and solicitations sponsored by Geisinger or a Geisinger department must comply with all federal, state and local laws as well as the organization's reporting, record-keeping and registration procedures.

Charitable fundraising activities and solicitations made on behalf of Geisinger must be truthful, accurate and complete. Consult the Fundraising Guidelines on INFOweb, or call the [Development Office](#) to learn more about soliciting or accepting financial or in-kind donations on behalf of Geisinger. You can call the Human Resources Department with questions concerning solicitation in the workplace.

Relevant Policies and Procedures:

[Human Resource Policy No. 04.370 – Solicitation & Distribution](#)
[Privacy Office Manual Policy No. 09.06.042 – Fund Raising](#)

HEALTH PLAN OPERATIONS

There are many state and federal laws that govern our health plan operations. If your job includes health plan-related responsibilities, you must be familiar with and follow the policies and procedures adopted by the organization to ensure that we comply with all applicable health plan rules.

Relevant Policies and Procedures:

Geisinger Health Plan Code of Conduct

What are some examples of laws that regulate our health plan business?

Almost all health plan business practices are regulated in some way. Here are just a few examples of our health plan activities that are subject to state and/or federal regulation:

- Quality assurance and utilization review activities
- Claims processing and payment
- Cost reporting
- Financial solvency and investments
- Benefits design, underwriting practices and rate-setting
- Enrollment (including special status tracking)
- Sales and marketing
- Care management
- Provider contracting, credentialing and billing
- Member services, including grievances and appeals
- Member privacy
- Data reporting

Integrity in Our Community Relationships

POLITICAL CONTRIBUTIONS AND POLICY ADVOCACY

The tax-exempt organizations of Geisinger:

- Are prohibited from making political contributions, and
- Must observe restrictions on its public policy advocacy activities.

The tax-exempt affiliates themselves may not make direct or indirect contributions to candidates running for federal, state or local office, or to political parties, organizations, or committees, except as permitted by federal or state law. Individuals in a position to influence the activities of Geisinger must not personally benefit from our non-profit activities. As a result, it is inappropriate to provide gifts or subsidize travel or lodging for government or public officials. However, it is permissible to provide meals or refreshments as part of a business meeting, or as a normal business courtesy. If you have any questions about providing meals or refreshments, please consult your supervisor or department head, or contact the Corporate Compliance Officer, the Compliance Hotline **(1-800-292-1627)** or **make a report on-line at www.geisinger.org/alertline**.

As private individuals we can make personal contributions, but we may not contribute to candidates, political parties or political action committees on behalf of the tax-exempt affiliates of Geisinger, except as permitted by law. From time to time, individuals may provide personal contributions to support the Geisinger sponsored Political Action Committee ("PAC") which in turn supports various advocacy programs and makes PAC to PAC contributions. Check with the [Legal Department](#) if you have any questions about political contributions or the organization's lobbying and advocacy activities.

Relevant Policies and Procedures:

[Public Relations Marketing Policy No. 1.1.70 -- Sponsorships](#)

As an employee, can I be active in a political party?

You may, as a private citizen, participate in political, charitable, educational, community, religious, and similar organizations, so long as

- Participation does not raise a [conflict of interest](#) under the Code of Conduct, and
- You do so as a private citizen and do not imply endorsement by or representation of Geisinger

Integrity in Our Community Relationships

RECORD-KEEPING, RECORD RETENTION AND RECORD DESTRUCTION

Keeping accurate records is important. There are many requirements — such as accreditation standards and billing rules — that rely on good record-keeping.

You must be thorough, timely and truthful with medical and business records, whether paper or electronic. Records must be kept for the appropriate retention period, and then destroyed in the appropriate manner.

Records are kept across Geisinger within a variety of care settings. Geisinger Medical Center, Geisinger Wyoming Valley Medical Center, Geisinger-Shamokin Area Community Hospital, Geisinger-Community Medical Center, Geisinger-Bloomsburg Hospital and Marworth are either licensed hospitals or facilities which have specific regulatory requirements regarding different types of medical record information. Geisinger Health Plan and Geisinger Indemnity Company are licensed insurers and thus are also subject to various regulatory requirements. It is not possible to list all of the applicable rules; however, you need to be aware that you must learn the rules that apply to any medical record documentation or other records with which you are required to work as part of your job responsibilities. As a guiding principle, please remember that:

- False facts and false records are not permissible.
- Records are only provided to people who have a legal "need to know" or those who are authorized by a patient or someone else who has the authority to provide such an authorization.
- Records are maintained for as long as legally required.
- Patient confidentiality must be preserved.
- Records are disposed of only in accordance with established policies and protocols.
- Alteration of records is strictly prohibited.

Business documents and records are retained in accordance with the law and Geisinger policies and procedures. Business documents include paper documents such as letters and memos, claims, enrollment applications, computer-based information such as e-mail or computer files on disk or tape, and any other medium that contains information about the organization or its business activities. It is important to retain and destroy records appropriately according to the applicable policy. You must not tamper with records, nor remove or destroy them prior to the specified date.

You can find Geisinger's [Document Retention Policy](#) and [Supplemental Document Retention Policy](#) on the INFOweb. These policies describe the retention periods for certain types of records, including:

- Medical Records
- Business Records
- Records created for purposes of Medicare, Medicaid and other government sponsored programs
- Records related to HIPAA

Integrity in Our Community Relationships

RESEARCH AND FUNDING

Geisinger organizations and individuals that conduct research and grant-related activities must do so in a manner that is consistent with ethical and legal standards. To ensure that these standards are met, all research projects must be appropriately reviewed and approved through the research review process before any activity begins.

Geisinger complies with laws that govern federal and state funded grants and contracts, including appropriate expenditures and accurate reporting of and accounting for funds received.

Likewise, protecting research participants is of the utmost importance. The members, patients and others who participate in clinical research activities must be fully informed about the risks, benefits, experimental nature and procedures involved. Geisinger will not discriminate against patients or members on the basis of participation or non-participation in research activities.

TAX-EXEMPT AND NONPROFIT STATUS

Geisinger and several of its related organizations are nonprofit and tax-exempt organizations. This means that we must only use Geisinger nonprofit and tax-exempt assets to further the organization's Mission and nonprofit purpose, and not to serve the personal interests of any individual.

In addition to restrictions on [fundraising](#) and [political contributions](#) already discussed in the Code of Conduct, our special tax and nonprofit status puts very important restrictions on how we conduct our business and how we use our resources. For example, Geisinger is permitted to pay only reasonable compensation (fair market value) in exchange for goods or services provided by others, including providers, employees and vendors. Similarly, Geisinger and its related organizations are committed to providing charity care and other financial assistance to patients who meet our organizational guidelines, in accordance with law and as part of our Mission. Geisinger shall refrain from engaging in any activity that might jeopardize its tax-exempt status. Compensation and other business arrangements must be entered into on an impartial and fair basis.

The laws that govern our tax-exempt and nonprofit status are very complicated — and very important. If you have any questions about whether Geisinger is putting its assets and other resources to proper use, you should voice those concerns to your supervisor or manager. You can also raise these concerns to the [Legal Department](#), the Corporate Compliance Officer, the Compliance Hotline **(1-800-292-1627)** or make a report on-line at www.geisinger.org/alertline.

A number of corporations within Geisinger are taxable entities. Geisinger employees shall timely and accurately report payments to appropriate taxing authorities and file all tax and information returns in a manner consistent with applicable laws for such taxable entities.

Integrity in Our Community Relationships

TRUTHFULNESS AND COOPERATION

Health care is a highly regulated industry, so Geisinger is subject to regular and extensive oversight by government agencies, law enforcement authorities and external auditors. You must be truthful and cooperative whenever submitting a regulatory filing or certification or responding to an external inquiry on behalf of Geisinger. Likewise, you must be truthful and cooperative whenever we are involved in an inquiry or investigation led by someone in the organization, such as the Legal or Internal Audit Departments.

Consult immediately with the [Legal Department](#) if, as a representative of Geisinger, you receive any summons, subpoena, inquiry, or other communication from a court, law enforcement official, government agent, or from any outside lawyer. Before submitting to an interview, answering any questions, producing any documents, or even responding to any requests about litigation or an investigation, you are strongly encouraged to consult with the Legal Department. This applies to matters in which Geisinger is involved directly, like an investigation or a lawsuit involving Geisinger. It also applies to matters in which Geisinger is involved indirectly, including investigations of suppliers, dealers, or competitors. The Legal Department represents Geisinger itself as well as all its employees acting within the course and scope of their job duties and responsibilities.

I was approached in the parking lot by someone claiming to be from a government agency!

He says he wants me to turn over some documents I've been working on! What should I do?

Health care organizations need to be prepared to respond to government investigations. Even though you are expected to cooperate with these investigations, you should do so with the guidance and assistance of the organization. If you are ever approached by someone claiming to be from the FBI, police or other government investigators or enforcement authorities, follow these simple but important steps:

1. Remain calm — most likely neither you nor the organization is in trouble. Cooperate — but don't speculate about what you think they want to hear.
2. You may refuse to answer questions and you may ask for help from one of the organization's lawyers.
3. Ask for ID — government officials should be able to identify themselves with a badge or other official documentation. Photocopy or write down this information.
4. Call your supervisor and the Legal Department as soon as possible. They will help you decide what to do next. The Legal Department, once notified, can arrange for legal counsel to be present for your interview.

Integrity in Our Care and Service Relationships

The relationships we build with our patients, members and the community are the foundation of everything we do at Geisinger: no one relies on our integrity more than them. Each of the following standards is vital to ensuring that we earn and maintain their trust every day.

[Information Security](#)

[Patient and Member Privacy](#)

[Patient and Member Rights](#)

[Professionalism, Eligibility, Debarment and Exclusion](#)

[Quality of Care](#)

Integrity in Our Care and Service Relationships

INFORMATION SECURITY

In addition to protecting our patients' and members' privacy, we are also required to keep their information secure. This means that not only must Geisinger maintain confidentiality; we must also ensure the integrity and availability of patient and member information. We do this by complying with [information security policies and procedures](#) and by reporting any suspected information security concerns. You can learn more about information security on the INFOweb by visiting the [Information Security Office](#).

“Information Security” seems like such a big and scary issue. Can I really do anything to stop hackers and others who want to steal information?

With just a few simple precautions, each and every one of us can reduce threats to information security:

1. Don't share your computer passwords with anyone — ever.
2. Lock your computer work station and/or use password-protected screensavers that automatically kick in when you are away from your work station.
3. Secure personal computing devices, such as laptops, hand-helds, PDAs and cell phones.
4. Do not open email attachments that are suspicious or come from unknown senders.

PATIENT AND MEMBER PRIVACY

Each one of us is expected to respect patient and member privacy at all times, even after our employment or other association with Geisinger has ended. You may use and disclose the protected health information (“PHI”) of patients and members only as allowed by Geisinger's policies and procedures governing privacy and confidentiality, including:

- We use PHI only when we have a clinical or business need
- We share PHI with co-workers only when they have a clinical or business need for the PHI
- For purposes of payment or health care operations, we use and disclose only the minimum necessary PHI
- We may not disclose PHI to anyone outside the organization except as authorized by the patient or member or as otherwise permitted by law.
- We safeguard all PHI that is within our possession or control and take appropriate steps to make sure that PHI is not lost or accessible to people who do not have the right to access it.
- Accuracy is very important to our work at Geisinger. Paying strict attention to detail ensures that business sensitive information and protected health information in the form of records, mailings and other documentation is both accurate and complete.

Visit the INFOweb for more information and resources about [Geisinger privacy policies](#) and [HIPAA](#).

Relevant Policies and Procedures:

[Human Resource Policy No. 04.360 – Protection of Confidential Information & Sanctions](#)

Integrity in Our Care and Service Relationships

PATIENT AND MEMBER RIGHTS

Members, patients and other individuals in our care have the right to receive high quality care that is respectful of individual and cultural differences. We treat all members, patients and others with respect, dignity and fairness, and we provide care and access to care that is medically necessary and appropriate. We provide care and access to care equally, without regard to race, marital status, gender, sexual orientation, national origin, age, disability, religion or ability to pay. We listen to our patients' and members' wishes about their care, and we respect the choices they express in **advance directives**. We encourage patients to participate in medical and ethical decisions concerning their care. We also do not discriminate against patients and members who have chosen not to adopt **advance directives** about their care.

My coworker/friend/family member is in the hospital. Can I use my system access to find out how she's doing?

No — absolutely not! Your coworker/ friend/ family member is a patient first and foremost, and therefore he/she is entitled to the same privacy protections as all of our other patients. Patient and member PHI should never be accessed for personal reasons — even if your job allows system access and even if you just want to check on a friend, coworker, or family member.

Can I access my own medical record?

No -- not in your capacity as an employee of Geisinger. If you wish to view your own medical record you must request a copy from Health Information Management.

Integrity in Our Care and Service Relationships

PROFESSIONAL ELIGIBILITY, DEBARMENT AND EXCLUSION

Geisinger expects that all employed and contracted caregivers maintain appropriate professional relationships with their patients, within and outside the clinical setting. We expect that caregivers follow all standards of professionalism established by their respective licensing boards.

Geisinger only employs or contracts with caregivers who are eligible to perform their work duties within the scope of their licenses, certifications or other professional standing.

Geisinger does not knowingly employ or contract with individuals or organizations that are ineligible to perform work related directly or indirectly to federal health care programs.

If you are a licensed, certified or registered professional, you are required to keep your professional eligibility in good standing. You must tell your supervisor immediately if any adverse action has been taken against you, including, without limitation, suspension, revocation, expiration or lapse of eligibility. Likewise, you must immediately tell your supervisor or primary business contact if you have been debarred or excluded from government-sponsored health care or other contracting programs.

In addition, there are certain issues that some licensed caregivers are required to personally report to their professional licensing boards. If you are a caregiver and have questions about your individual reporting duties, contact the Credentialing Department.

QUALITY OF CARE

Geisinger is committed to providing quality care delivered with respect, skill and empathy. Each of us is responsible for maintaining and contributing to the [quality of care we provide](#) to each patient and member. At Geisinger, we are all expected strive for and achieve our [safety and quality](#) goals.

Integrity in Our Workplace Relationships

We rely on each other to exercise good judgment, to be accountable for our commitments, and to help create a safe and respectful work environment. That is why it is so important that we build our work relationships on integrity. We create and maintain a productive, safe and respectful workplace by fulfilling the following expectations.

[Accountability and Discipline](#)

[Alcohol, Firearms and Controlled Substances](#)

[Compliance Education](#)

[Organizational Policies and Procedures](#)

[Personal Communications](#)

[Protection of Personnel – Non-Retaliation](#)

[Reporting Code of Conduct Violations and Other Compliance Concerns](#)

[Responsibilities of Supervisors and Managers](#)

[Harassment and Disruptive Behavior](#)

Integrity in Our Workplace Relationships

ACCOUNTABILITY AND DISCIPLINE

We are confident that employees, providers, Board members, volunteers, residents and others who represent Geisinger are directed by the organization's Mission and a sense of what is right. Please use this Code of Conduct and other resources made available to you by the organization to help you make the right decisions.

A violation of the standards described in this Code of Conduct — or of any Geisinger policy — can result in disciplinary action, up to and including discharge from employment or termination of your contract. Disciplinary action taken by the organization to uphold this Code of Conduct will be imposed fairly and consistently, commensurate with the violation in question and Geisinger discipline guidelines and, if applicable, with terms of employment and collectively bargained labor agreements.

ALCOHOL, FIREARMS AND CONTROLLED SUBSTANCES

Geisinger strives to maintain a safe and healthy work environment. You may not work while under the influence of alcohol or drugs, and may not possess weapons or other contraband while on Geisinger property (including in your vehicles while parked in a Geisinger lot) or conducting Geisinger business. Access to and dispensing of controlled substances is limited to licensed individuals specifically authorized to handle them. Go to the INFOweb to read our [policies about alcohol, firearms and a drug-free workplace](#).

COMPLIANCE EDUCATION

Compliance education — whether formal group presentations, computer-based training, self-study materials, broadcast communications, department-specific or one-on-one-focused training sessions — is an important part of our professional development and commitment to Geisinger and its Mission. Because we must all act in compliance with relevant laws, regulations and rules, Geisinger expects all of us to participate in required compliance education.

ORGANIZATIONAL POLICIES AND PROCEDURES

All policies and procedures adopted by Geisinger and its business units should be aligned and consistent with the Code of Conduct. The organization or your department may adopt more detailed or more restrictive policies and procedures relating to the standards addressed in the Code of Conduct, and may adopt policies and procedures that are not specifically addressed in the Code of Conduct, so long as they do not conflict with the Code of Conduct. Be sure to check with your supervisor to see if there are additional policies or procedures that apply to you and the work you do.

ORGANIZATIONAL RESOURCES AND EQUIPMENT

Geisinger is legally obligated to protect its property and ensure its facilities and equipment are used appropriately. Resources such as materials, equipment, time and space should be used only for your work, unless your supervisor has specifically made an exception according to company policy. All equipment and supplies provided to you by Geisinger are the property of Geisinger and theft thereof is strictly prohibited. Any equipment and supplies must be returned to Geisinger if your employment ends for any reason whatsoever.

Integrity in Our Workplace Relationships

PERSONAL COMMUNICATIONS

One of Geisinger's greatest assets is its reputation, and we are all responsible for maintaining that reputation. You must not publish, post or otherwise communicate negatively or make disparaging statements about Geisinger or your coworkers. This applies to communications in any form – verbal, written, electronic, visual or otherwise. It is up to each of us to bring concerns about the organization to the organization itself, rather than to air our concerns in a public forum. If you, as an individual, choose to discuss your work in a public setting, such as at a conference or on a personal "blog," you must comply with organizational policies on [privacy](#), [business confidentiality](#) and [conflicts of interest](#).

There are many resources for information and information sharing, such as email and the internet. If you have access to these resources as part of your work, you must comply with applicable organizational policies. You can find information concerning email and internet usage by visiting the [Human Resources](#), [Legal Department](#) or [Information Security Office](#) websites on the INFOweb.

Relevant Policies and Procedures:

[Human Resource Policy No. 04.380 – Electronic Communications and Computing](#)
[Information Security Office Policy No. 07.06009 – Email Usage](#)
[Information Security Office Policy No. 07.06006 -- Internet Usage](#)
[Public Relations & Marketing Policy No. 7.1.11 – Social Media Usage](#)

PROTECTION OF PERSONNEL – NON-RETALIATION

Retaliation against anyone who, in good faith, reports suspected non-compliance with this Code of Conduct, the Corporate Compliance Program, or any organizational policy, is strictly forbidden. You will not suffer any penalty or retribution for reporting, in good faith, any known or suspected concern. Geisinger will take appropriate disciplinary action against anyone who penalizes, ostracizes or harasses someone who has reported concerns in good faith. However, this non-retaliation policy does not allow people to avoid discipline if they are engaged in improper behavior. Anyone who has been involved in inappropriate activity will be subject to appropriate discipline.

If you believe you have experienced retaliation for reporting a concern in good faith, contact your supervisor or HR representative. Alternatively, you can contact the [Corporate Compliance Officer](#), the [Compliance Hotline \(1-800-292-1627\)](#) or **make a report on-line at www.geisinger.org/alertline**.

Relevant Policies & Procedures:

[Human Resource Policy No. 04.320 – Retaliation](#)
[Corporate Compliance Policy No. 04.400 – Policy Regarding False Claims Act Education](#)

What is a "good faith" report?

When a person makes a report about something that he or she believes is true, and that he or she believes violates the Code of Conduct or another organizational policy — that's a good faith report. Reports that are made frivolously or maliciously are not considered good faith.

Integrity in Our Workplace Relationships

REPORTING CODE OF CONDUCT VIOLATIONS AND OTHER COMPLIANCE CONCERNS

If you think a business practice or relationship is or could be illegal or improper, then it is your responsibility to tell the organization about your concern. There are many ways to do this:

- The best place to start is with your supervisor. He or she will be able to identify the policies and procedures we have in place to guide our conduct.
- If you are not comfortable talking to your supervisor then contact your HR representative or the Corporate Compliance Officer.
- You may also call the Corporate Compliance Hotline –**1-800-292-1627** or **make a report on-line at www.geisinger.org/alertline**. Hotline callers and web reporters remain anonymous unless they voluntarily disclose their identity. All reports to the Hotline must include enough information to investigate concerns raised.

I called the Corporate Compliance Hotline to report a concern. What happens next?

Depending on the nature of your report, the Chief Compliance Officer may refer the matter to another part of the organization (such as Human Resources, for employment issues), delegate the matter to one of his/her colleagues or conduct a review with assistance from others in his/her Department. Reviews by the Chief Compliance Officer often include document reviews, interviews and coordination with the Legal Department and affected business units. After this review, recommendations will be made to department or organizational leaders about appropriate corrective actions. When the review is complete and a corrective action plan is in place, if needed, the Corporate Compliance Officer or his delegate will notify the person who made the report. While they may not be at liberty to share details about their findings or other follow-up with you, they will provide general information about the status of their review and the organization's response.

RESPONSIBILITIES OF SUPERVISORS AND MANAGERS

Everyone who represents Geisinger is responsible for doing his/her work with integrity and in accordance with the Code of Conduct. Supervisor and managers have additional responsibilities. For example:

- When an employee comes to you with a compliance concern, you must take it seriously. You must listen to their concerns with an open mind and follow up appropriately.
- When the organization identifies mandatory compliance-related training, you must ensure that your staff receives that training.
- When compiling an employee's performance review, you should consider whether the employee's behavior has been consistent with the Code of Conduct.
- If an employee reports suspected health care fraud to the government, he or she is entitled to "whistleblower" protections. These include protection against retaliation. While we encourage employees to report their concerns to the organization first, we must make sure that we observe appropriate whistleblower protections if someone chooses to report to the government instead.
- Never retaliate against or ostracize an employee for bringing up a compliance concern in good faith.

Integrity in Our Workplace Relationships

HARASSMENT AND DISRUPTIVE BEHAVIOR

Everyone deserves to work in an environment where they are treated with respect, dignity and fairness. Geisinger supports equal opportunity employment and complies with federal, state, and local equal opportunity and affirmative action laws. Geisinger does not tolerate discrimination based on:

- Race
- Color
- Religion
- Ancestry
- Sex
- National origin
- Pregnancy
- Sexual orientation
- Age
- Disability
- Marital status
- Veteran status

We expect you to treat your coworkers with respect, dignity and fairness. Geisinger does not tolerate any form of harassment, sexual or otherwise, or any form of workplace violence or threats of violence. Intimidating and disruptive behaviors can foster medical errors, contribute to poor patient satisfaction and preventable adverse outcomes, increase the cost of care and cause qualified clinicians, administrators, managers and affected employees to seek new positions in more professional environments. Intimidating and disruptive behaviors include, but are not limited to, the following: overt actions such as verbal outbursts and physical threats; passive activities such as refusing to perform assigned tasks or quietly exhibiting uncooperative attitudes during routine activities; reluctance or refusal to answer questions, return phone calls or pages; condescending language or voice intonation; and impatience with questions. Overt and passive behaviors undermine team effectiveness and can compromise the safety of patients. All intimidating and disruptive behaviors are unprofessional and should not be tolerated.

Employees are urged to report any such activities to supervisors and/or HR representatives. The Compliance Hotline is also available at **1-800-292-1627** or **make a report on-line at www.geisinger.org/alertline**.

You can find the organization's policies on [violence in the workplace](#), [sexual harassment](#) and [equal employment opportunity](#) on the INFOweb.

SECTION 2

CORPORATE COMPLIANCE PROGRAM

Geisinger has created a [Corporate Compliance Program](#) to help prevent, detect and correct violations of the legal, professional and ethical standards we are committed to upholding. The Corporate Compliance Program is designed to support sound decision-making by everyone in the organization. The purpose of Geisinger's Corporate Compliance Program is to:

- Accentuate Geisinger's commitment to accurate submission of all claims and other filings to third parties;
- Define employee responsibility to comply with all applicable laws and regulations governing the organization's business affairs;
- Establish total organizational accountability for corporate compliance from the Board of Directors through all levels of management, staff, and employees;
- Provide a process by which any employee can identify and confidentially report potential noncompliance exposures;
- Provide guidance to management regarding the need for preventive and self-check measures to ensure compliance with all applicable laws and regulations;
- Establish mechanisms to develop and coordinate ongoing effective training and education;
- Maintain an organizational corporate compliance framework with a reporting relationship to the Board of Directors;
- Establish effective lines of communications;
- Conduct internal auditing and monitoring specifically on corporate compliance matters;
- Set forth enforcement standards through well-publicized disciplinary guidelines; and,
- Respond promptly to detected problems and undertake corrective action.

How am I expected to participate in the Corporate Compliance Program?

You participate by doing the following:

1. Read and understand the Code of Conduct and the other policies and procedures that affect your work.
2. Remember that we are all responsible for keeping the organization in compliance. Everyone will be asked to complete the [Acknowledgement Form](#), as a condition of employment or other position in the organization. This lets the organization know of your commitment to compliance and to the Corporate Compliance Program, and gives you an added opportunity to bring your concerns to the organization's attention.
3. [Ask questions](#) if you don't understand what's expected of you, and [report your concerns](#) if you believe the organization is not upholding its commitment to compliance.

Corporate Compliance Program

ASKING QUESTIONS

If you have a question about the Code of Conduct or any other organizational policies, or if you ever have a compliance or privacy concern, it is important to voice your questions and concerns. It's easy to do — just follow the steps below.

- Discuss the issue with your immediate supervisor. If you are not comfortable discussing the issue with your supervisor, go to the next step.
- Call the Corporate Compliance Officer.
- **If you would prefer to voice your concern anonymously, you may call the toll-free Corporate Compliance Hotline at 1-800-292-1627 or make a report on-line at www.geisinger.org/alertline.**

REPORTING CONCERNS — THE CORPORATE COMPLIANCE HOTLINE

The Corporate Compliance Hotline and webpage are managed by an outside, independent contractor and is a way for anyone to bring up his or her compliance and privacy concerns anonymously. However, you are encouraged to identify yourself when making a report so we can investigate your concern promptly and thoroughly and provide direct feedback.

Call anytime — toll-free: 1-800-292-1627 or make a report on-line at www.geisinger.org/alertline

No employee will suffer any penalty or retribution for reporting in good faith any suspected misconduct or non-compliance.

If you learn of activity that might violate applicable laws or the standards described in the Code of Conduct, you must report that activity to your supervisor. You can also make a report to the Corporate Compliance Officer or call the Corporate Compliance Hotline. It is only through your eyes, ears and good judgment that we can be sure we are meeting our legal, ethical and professional commitments. Remember: You may be the only person who knows about a potential problem. We need to hear from you!

Corporate Compliance Hotline

1-800-292-1627

or

make a report on-line at www.geisinger.org/alertline

Corporate Compliance Program

CORPORATE COMPLIANCE CONTACTS AND OTHER HELPFUL RESOURCES

Corporate Compliance Officer
Lori Biacchi 570-214-2061

Corporate Compliance Hotline
1-800-292-1627

Corporate Compliance Web Reporting
www.geisinger.org/alertline

[Corporate Compliance Program Site](#) on INFOweb

Do you have an employment or HR concern or question?

- Contact [Human Resources](#)

Are you concerned about Information Security?

- Contact the [Information Security Office](#) at 570-271-8119

Is there a medical error or quality issue you wish to report?

- Contact [Risk Management](#) at 570-214-9873 or
- the [Legal Department](#) at 570-271-6781

Do you have a medical ethics question?

- Contact the [Bioethics Committee](#) at 570-214-7340

A question about health research?

- Contact the [Center for Health Research](#) at 570-271-5742

Confused about what is a compliance issue versus one of these other kinds of issues?

Don't worry — if you call the Corporate Compliance Hotline or email the Chief Compliance Officer, we'll make sure your question gets forwarded to the right resource within Geisinger, even if it is not a **compliance question** after all.

CODE OF CONDUCT

ACKNOWLEDGEMENT

I have received, read, and acknowledge this Code of Conduct. I agree to carry out my job responsibilities in an ethical manner and in compliance with established policies and procedures of Geisinger. I understand that I may be subject to disciplinary action, up to and including termination of employment, if I do not perform my work duties in an appropriate ethical manner. I also understand that it is my obligation to obtain additional information about legal requirements or other requirements as may be necessary to complete my job responsibilities. If I have any questions, I understand that I have the ability to discuss questions with my supervisor, administrator, or the Corporate Compliance Officer. In addition, I understand that I have an obligation to report conduct I believe to be inconsistent with these guidelines and that I have access to a confidential hotline (**1-800-292-1627** or **make a report on-line at www.geisinger.org/alertline**) to communicate concerns.

Signature _____

Print Name _____

Date _____

Glossary of Terms	
Advance directives	Advance directives are sometimes called living wills. These are a patient's instructions for their health care treatment and decision-making, in the event that they are unable to make these decisions for themselves.
Antikickback	The federal Antikickback law prohibits health care organizations from paying, receiving or offering money or anything else of value in exchange for patient referrals.
Antitrust laws	Antitrust laws are intended to promote business competition. These laws prohibit anti-competitive behavior and unfair business practices, such as monopolies, bid rigging and price fixing, especially by businesses or groups of businesses that are a dominant force in the market.
Compliance question	Compliance issues relate to any organizational activity that is regulated by federal or state law. However, they are typically issues that relate to reimbursement, licensure, privacy, security, patient referrals, purchasing, conflicts of interest, vendor relations and other business practices.
Corporate Compliance Officer	Geisinger has a Corporate Compliance Officer who is responsible for overseeing the System's Corporate Compliance Program, ensuring the Organization's continued compliance with the law and handling any complaints involving corporate compliance. The Corporate Compliance Officer can be reached at 570-214-2061.
Corporate Compliance Hotline	Corporate Compliance Hotline 1-800-292-1627 or make a report on-line at www.geisinger.org/alertline .
Employment or HR	Employment or HR questions would include matters relating to payroll, benefits, leaves of absence, workload and the workplace environment generally.
EMTALA	Emergency Medical Treatment and Active Labor Act of 1986
Family	Family includes spouse; birth or adoptive parent, child or sibling; step-parent, child, or sibling; parent, child or sibling-in-law; grandparent or grandchild; and spouse of a grandparent or grandchild.
Financial relationship	This includes an ownership or investment interest in an entity (or its owner) or a compensation arrangement between the physician and the entity.
Health research	Investigating, developing, testing and evaluating health information in order to contribute to the general body of knowledge on that subject. This may include clinical studies as well as health services research, whether sponsored by Geisinger or another organization.
Geisinger	Geisinger is an integrated health services organization widely recognized for its innovative use of the electronic health record and the development of innovative care delivery models such as ProvenHealth Navigator®, ProvenCare® and ProvenExperience®. As one of the nation's largest health service organizations, Geisinger serves more than 3 million residents throughout 45 counties in central, south-central and northeast Pennsylvania, and in southern New Jersey at AtlantiCare, a Malcolm Baldrige National Quality Award recipient. In 2017, the Geisinger Commonwealth School of Medicine and Geisinger Jersey Shore Hospital became the newest members of the Geisinger Family. The physician-led system is comprised of approximately 30,000 employees, including nearly 1,600 employed physicians, 13 hospital campuses, two research centers, and a 583,000-member health plan, all of which leverage an estimated \$12.7 billion positive impact on the Pennsylvania and New Jersey economies. Geisinger has repeatedly garnered national accolades for integration, quality and service. In addition to fulfilling its patient care mission, Geisinger has a long-standing commitment to medical education, research and community service. For more information, visit www.geisinger.org , or connect with us on Facebook , Instagram , LinkedIn and Twitter .
HIPAA	Health Insurance Portability and Accountability Act of 1996
Information Security	Information security means maintaining the confidentiality, integrity and availability of electronic information.
Legal Department	You will find information about the Legal Services Department and its staff on the INFOweb

Glossary of Terms	
Medical error or quality issues	Medical errors and quality concerns include issues like patient safety, provider competence and quality of care.
Medical ethics	Medical ethics involves evaluating the merits, risks, and social concerns of health care activities. Medical ethics includes questions of death and dying, health care decision-making for impaired or minor patients, reproductive medicine, evaluation of conventional and alternative treatments, and the distribution and utilization of health care resources.
Corporate Compliance Program	You will find information about the Corporate Compliance Program on the INFOweb
Mission	Geisinger's Mission is to enhance quality of life through an integrated health service organization based on a balanced program of patient care, education, research and community service.
Nonprofit purpose	Nonprofit organizations do not serve private interests, unlike for-profit organizations, which ultimately serve the interests of their shareholders. Often when people refer to the purposes of nonprofit organizations they are referring to scientific, educational and other charitable purposes.
Patient Freedom of Choice	The federal Freedom of Choice Law guarantees Medicare and Medicaid patients the right to obtain health services from a qualified provider.
Privacy	There are many federal and state laws that require us to safeguard the confidentiality of patients, members and research participants. Some of those laws also give individuals additional privacy rights, such as the right to access their records, the right to request an amendment to their records, and the right to receive a list of to whom we have disclosed their information.
Reporting	There are four ways to report a security or other incident: Help Desk 570-271-8092 Information Security Office 570-271-8119 Compliance Hotline at 1-800-292-1627 Compliance Webpage at www.geisinger.org/alertline
Research	Activities relating to investigation, development, testing and evaluation that are designed to contribute to the general body of knowledge. This may include clinical studies as well as health services research, and may be sponsored by Geisinger or another organization.
Research participants	Members, patients or other individuals who are, or whose information is, involved in research.
Research review process	This process involves the review and approval of research protocols by the organization's Institutional Review Board in order to protect research participants.
Retaliate	Supervisors, coworkers and others are not permitted to retaliate against a person for something they did in good faith. Retaliation can include things like demotion, failure to promote, hostility, adverse changes in job conditions or requirements, or other undesirable actions by an employer, supervisor or coworker.
Retaliation	Retaliation is a negative consequence for something done in good faith. Retaliation can include things like demotion, failure to promote, hostility, adverse changes in job conditions or requirements, or other undesirable actions by an employer, supervisor or coworker. It is never appropriate to retaliate against an employee for a good faith action.
Stark	The "Stark" law is a federal law that prohibits referrals from physicians to certain designated health services in which that physician or his or her family members have a financial interest.
Values	Geisinger's Values are Excellence, Service Orientation, Individual Dignity, Teamwork, Physician Leadership, Diversity, Education, Research, Fiscal Responsibility and Tradition.

Revised/Reviewed: 11/18, 01/19