



A Guide and Overview of

Standards of Business Conduct



Integrity | Compassion | Accountability | Respect | Excellence

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St. Luke's caregivers, support staff and partners,

You are essential to our mission and to our efforts when it comes to setting and expecting high standards in ethics, values, quality and culture. Our standards provide a solid foundation as health care continues to change and as we adopt and adapt to new practices, regulation and technology.

Here you will find helpful information regarding our organization's high standards, values and ethics, and an indispensable guide to responsibilities and actions.

Our values of integrity, compassion, accountability, respect and excellence inspire our always behaviors. Each member of the St. Luke's team is responsible for knowing and putting into practice our values and always behaviors, with goals of trust, exceptional experiences and patient-centered care in mind.

We also practice the principle of "see something, say something," and urge you to speak up when you see behaviors that do not align with our standards.

A heartfelt thank you for all you do every day to care for our patients and to serve our communities and each other. You are the heart of St. Luke's, and the reason our organization has taken its place among the top systems in the nation for quality, value and care.

With appreciation,

A handwritten signature in black ink, appearing to read 'Chris R. H.'.

Chris Roth
President and CEO



General Ethical Standards

Our culture

Be Exceptional – Our behaviors drive our culture. We commit to creating a fair patient and employee-centered culture through:

- Open and honest discussions about risks, errors and expectations.
- Responding in a fair and consistent manner.
- Multidisciplinary learning and system improvement.

We value a positive and inclusive work environment

We are committed to enhancing diversity, equity and inclusion in the workplace and fostering a positive work environment. Our organization is an equal opportunity employer and does not discriminate against employees or job applicants based on race, religion, color, sex, sexual orientation, gender identity, age, national origin, disability, veteran status, or any other status or condition protected by law.

Commitment to diversity, equity and inclusion

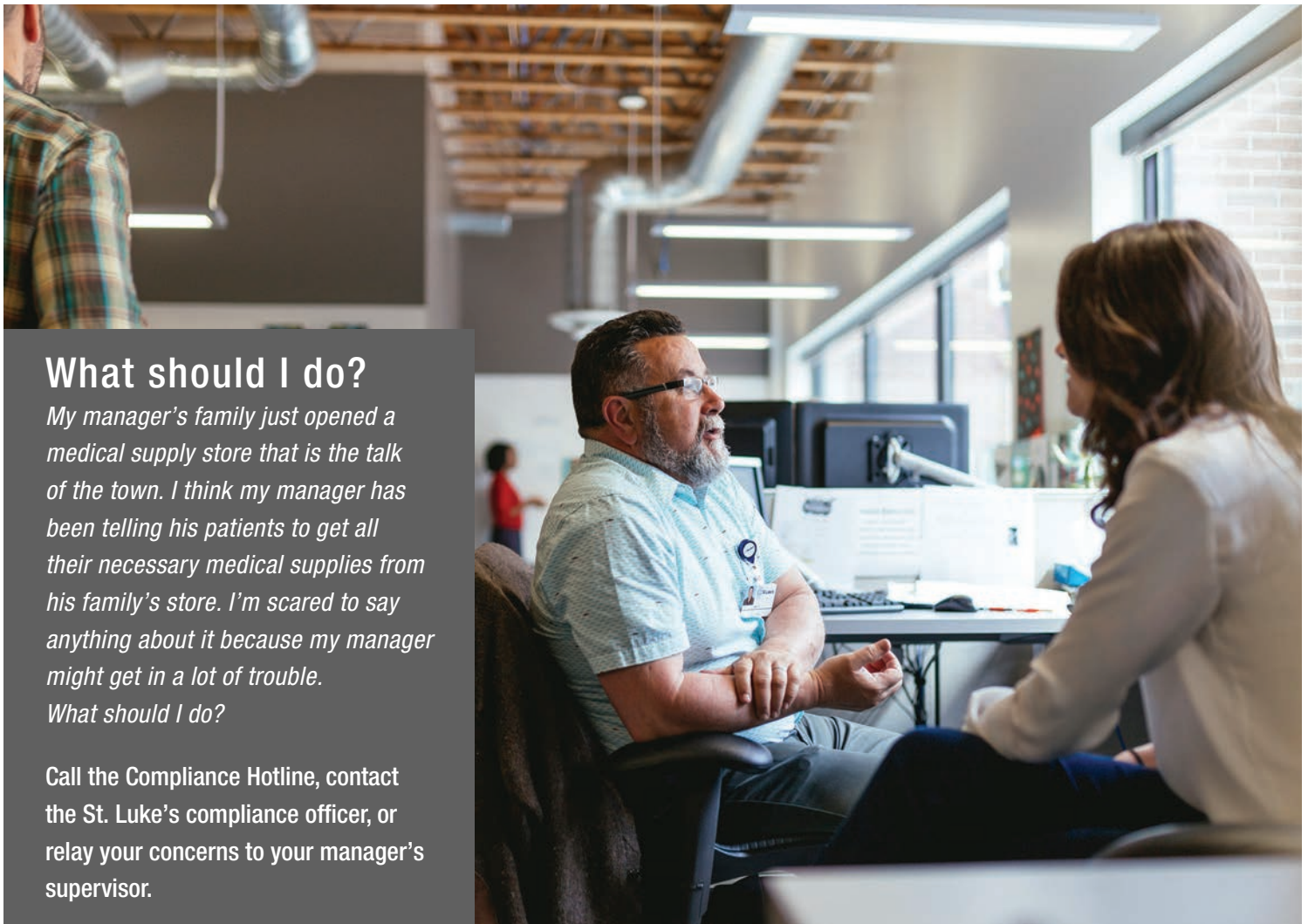
We foster an environment that embraces our employees' unique strengths, experiences and perspectives which drive exceptional patient-centered care. We believe that everyone we encounter should be treated respectfully, equitably and justly. We are passionate about creating a diverse and inclusive environment that fuels innovation and supports our mission to improve the health of the people in the communities we serve.



Integrity
Compassion
Accountability
Respect
Excellence

We endeavor to improve the health of the people in the communities we serve. This is our mission, and this standards of business conduct furthers that call. All people who serve St. Luke's patients – clinicians, employees, contractors, suppliers, students and volunteers – must reinforce St. Luke's vision to be the community's trusted partner in providing exceptional, patient-centered care.

We expect everyone to exercise ethical behavior and to act with integrity – to be honest and do what is right. As such, St. Luke's has guiding principles intended to make it easier to do the right thing. Our ICARE values are at the heart of these principles, which define who we are and what we stand for as an organization.



What should I do?

My manager's family just opened a medical supply store that is the talk of the town. I think my manager has been telling his patients to get all their necessary medical supplies from his family's store. I'm scared to say anything about it because my manager might get in a lot of trouble.

What should I do?

Call the Compliance Hotline, contact the St. Luke's compliance officer, or relay your concerns to your manager's supervisor.

Fair employment practices

We treat everyone with dignity and fairness. We do not tolerate discrimination or harassment on the basis of any status or condition protected by law. Anyone who witnesses such harassment or discrimination is encouraged to report it immediately without fear of retaliation. Our policy protects all those who make good faith complaints to leadership or Human Resources or participate in an investigation about unlawful discrimination or harassment.

Human rights

Everyone has the right to be treated equally in the workplace and to have equal access to health care services. We support and regard human rights through our values, culture and behaviors presented here. We expect our suppliers and business associates to support and exhibit these behaviors as well.

Principles of our Standards of Business Conduct

With a culture built on trust, exceptional patient-centered care and experiences, we are guided by the following:

We maintain fair and ethical business practices.

Regulatory compliance

We are committed to following all the laws and regulations that apply to our business and health care operations. It is important that everyone, including those with whom we do business, understand and comply with the federal, state and local laws, rules and regulations applicable to their area of responsibility, including the rules of Medicare and Medicaid, and those of other state and federal programs. Violations of law may result in serious consequences, including oral or written warnings or reprimands, suspensions, terminations, financial penalties and potential reporting of the conduct to law enforcement.

Fraud, waste and abuse

We are committed to ensuring that all claims to government and private insurance payors are accurate and truthful. All claims must conform to all federal, state and local laws and regulations. Claims should be submitted only for services that were provided and documented. We prohibit any employee or agent of St. Luke's from knowingly presenting, or causing to be presented, claims for payment or approval that are false, fictitious or fraudulent. No false or misleading entries shall be knowingly made or submitted on any bills or claim forms, and no employee shall intentionally participate in any arrangement that results in such prohibited acts. Intentionally making a false statement in a medical record or any document that is used to support billing of medical services may be considered criminal fraud.

Gifts and gratuities

Gifts are usually given to create good will. However, sometimes accepting or giving a gift may create a conflict of interest or the appearance of a conflict of interest. Generally, you may accept a non-cash gift if it is unsolicited, of nominal value and not given to influence your judgment; otherwise, you should decline it. Perishable or consumable gifts given to a department or group are not subject to any specific dollar limitation, as long as they are not given for the purpose of encouraging patient referrals or to unduly influence vendor selection.

It is never appropriate to solicit gifts of any kind, whether directly or indirectly, from patients, or anyone doing business or seeking to do business with St. Luke's.



Being responsible with company time and resources

All of us who work for St. Luke's, employed or contracted, are responsible to protect the organization's assets and ensure their efficient use. When using St. Luke's assets or handling business on behalf of the organization, you are expected to do so for the good of St. Luke's, not for your own, or another's personal gain. Equipment, supplies and materials that are the property of St. Luke's should only be used with proper authorization. You are expected to obtain a supervisor's approval before participating in any non-St. Luke's activity on company time, or before using St. Luke's equipment, supplies, materials or services to perform any activity unrelated to your work at St. Luke's.



Anti-kickback laws and payment for referrals

We comply with federal and state anti-kickback laws and regulations. These laws prohibit the payment or receipt of something of value that is intended to encourage the purchasing, leasing or ordering of an item or service that may be reimbursed under a health insurance or government program. The “something of value” can take many forms, such as cash payments or the offering of investment opportunities, entertainment, credits, gifts, free goods or services, the forgiveness of debt, or the sale or purchase of items at a price that is not consistent with fair market value.

We do not routinely waive co-insurance or co-payments.

Protecting our reputation

Our reputation is our brand. Our brand is our promise and how others see us. It’s what we pledge to those we serve. St. Luke’s is one of Idaho’s most well-recognized brands with a well-respected reputation. Everyone representing St. Luke’s has the ability to shape our reputation through their actions and words. Each of us has been trusted to represent St. Luke’s, and we should do so in the best possible way at all times. We must treat our reputation like the well-earned asset it is: care for it, support it and value it. Beyond action and words, this means using our adopted brand standards and registered logo according to our guidelines.

Internal communication

St. Luke’s coordinates multiple internal communication channels to share organizational news and information with our staff and providers. The Source News on our intranet and a weekly email digest of Source News postings are the two main channels for news, events and inspiring employee stories. Staff members are encouraged to check Source News and the email digests at times that do not interfere with patient care or the duties of their job. Our solicitation policy does not permit postings of special offers or discounts from outside companies. We do post information from St. Luke’s Foundations, other departments, our auxiliaries and volunteer groups, recognized community partners, St. Luke’s sponsored programs and approved charities that help foster our mission of improving the health of people in communities we serve.



Social media

St. Luke's uses social media, such as Facebook and Twitter, to support our mission and share news about our people and the organization. St. Luke's monitors postings and comments on our social media platforms for compliance with our policies on social networking, acceptable use, confidentiality of information, protected health information and branding. St. Luke's employees shall not use their St. Luke's email address when signing up for non-work-related online services, including social media. Only individuals serving in approved and official roles may create and/or post organizational content to official St. Luke's social media sites.

Fair and ethical business practices

We will abide by a high standard of ethical behavior at all times. We demonstrate these characteristics through truthfulness and by obeying the rules that apply to the operation of our facilities and to employees' particular duties. We also honor confidential and proprietary information, and the intellectual property of others, including photos, written materials, software, music and videos.

Tax-exempt nonprofit organization

St. Luke's is an Idaho nonprofit corporation and a 501(c)(3) tax-exempt organization. As a nonprofit organization, St. Luke's earnings and assets are used for the benefit of the community, not individuals or private companies. St. Luke's, its employees and our affiliates are responsible for using St. Luke's assets in the service of its exempt purpose. State and federal laws and regulations prohibit the use of nonprofit assets for private gain. If any of these are violated, St. Luke's risks penalties including loss of its tax-exempt status and the benefits it provides for our community. All payments, transactions and financial activities must be structured appropriately and in accordance with St. Luke's policies.



Building appropriate relationships with contractors and suppliers

To achieve the best outcomes for our patients and stakeholders, we engage in effective and professional relationships with current and prospective contractors and suppliers. We act in an equitable manner, consistent with our organization's mission, vision and values. As such, we are committed to maintaining respectful treatment, being honest in our marketing and communications, and participating in fair competition. We make commitments to suppliers and contractors only with the correct authorization and correct sourcing/contract processes. When negotiating, we do so in good faith representing St. Luke's in a professional and ethical manner. We avoid encouraging contractors or suppliers to contribute to St. Luke's in a way that creates a conflict of interest.

Conflicts of interest

It is an expectation that we will avoid situations where personal interests may present a conflict of interest with St. Luke's. A conflict of interest arises if we have a personal, financial or other relationship/interest where our loyalties may be divided and/or compete with St. Luke's interests. If/when a situation arises that may be perceived as a conflict of interest, we will inform our leader(s), and St. Luke's leadership will determine how best to manage any potential conflicts of interest.

Solicitation

Our commitment to patient-centered care requires us to avoid disruptions in operations from any source that may interfere with employees' work, contractors' services and the obligations we have to patients and their families. St. Luke's is associated with various organizations in ways that help foster our work and mission to improve the health of people in the communities we serve. At times, these and a few other community-related organizations with a common mission may be allowed to solicit employee participation and/or contributions, under the control and direction of St. Luke's, as outlined in our Solicitation policy.

Other than for approved activities outlined in our policy, no one may engage in solicitation of any kind on our intranet or social media outlets, or on our property during an employee's work time or while other employees, contractors, volunteers are performing their duties. This includes soliciting or receiving anything of value, directly or indirectly, for the referral of patients. In addition, solicitation of patients and visitors is not appropriate or allowed.

Respect of the environment

We practice sustainability through building efficiency programs, waste mitigation management and smart use of natural resources. We continually strive to adopt and develop green practices and services to reduce or minimize our impact on the environment, and to operate our business in a way that conserves natural resources and complies with environmental laws and regulations.

We deliver exceptional quality care through competence, compassion and professionalism.

Quality of care

Patients and families are at the center of all we do at St. Luke's. Every plan, every process, and every policy is designed to meet these needs physically, mentally, emotionally, culturally or spiritually. Patient-centered care means we listen to truly understand just what those needs are and work together to accomplish the goals. We know, and studies show that the best results come from caring for the whole patient and listening to their valuable insights on their own health. We provide a safe, respectful, healing environment for our patients and families.

Maintaining accurate records

We will accurately document clinical professional services in the medical record, and such documentation will comply with legal requirements. We will code professional services to accurately reflect the documentation in the medical record and submit all documents in compliance with applicable payor regulations or requirements. We will not knowingly solicit, receive, offer or pay any remuneration directly or indirectly, in cash or in kind, in exchange for referrals.





Serving our community

For more than a century, our organization has invested resources toward improving health care infrastructure and strengthening community organizations and initiatives that share our mission to improve the health of people in the communities we serve: from Community Health Improvement Fund grants to local nonprofits, to scholarships for health care education, to support for statewide events, initiatives and community collaborations that cross our service area. We are committed to being a recognizable presence at community events, a trusted “go-to” source for knowledge and expertise, and an active participant in bringing groups together to collaborate with and support each other.

Maintaining required licenses and professional credentials

We are committed to knowing and performing the scope of work permitted by our licensure or credentials. We only allow individuals with current, valid licenses and credentials to perform duties as prescribed by their jobs. We do not employ, allow services to be provided by or contract with individuals who have been excluded from participating in federally funded health care programs, nor are they permitted to practice or bill through St. Luke's.

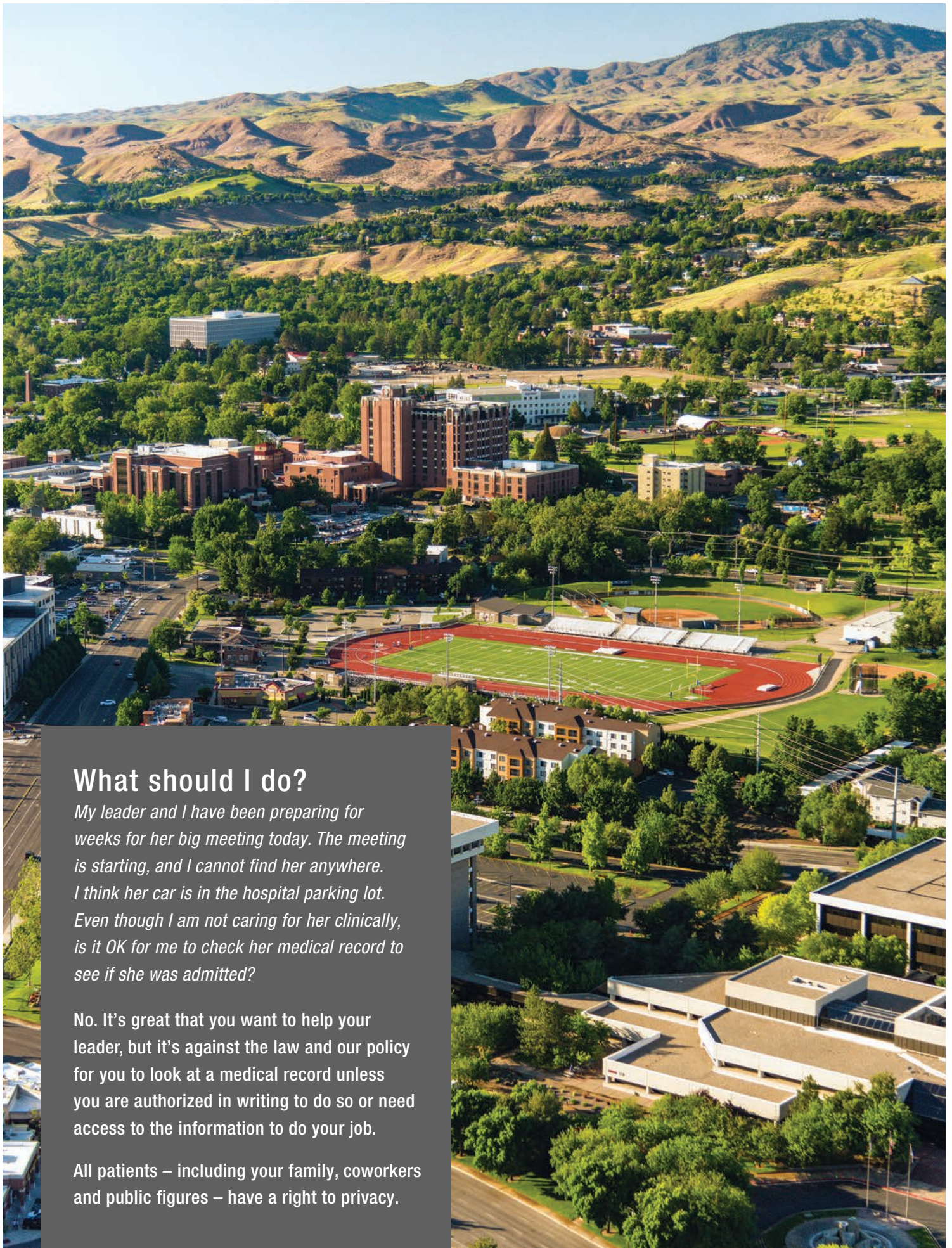


We protect privacy and confidentiality.

Privacy, confidentiality and patient rights

We collect information about a patient's medical condition, history, medication and family illnesses in order to provide the best possible care. We realize the sensitive nature of this information and are committed to maintaining its confidentiality. The Health Insurance Portability and Accountability Act (HIPAA) protects the privacy and confidentiality of patient information, and grants rights to all our patients. The St. Luke's Notice of Privacy Practices explains patients' rights, with respect to personal health information and how that information may be accessed, used or disclosed. It is our promise to our patients that we will access, use and disclose their health information only as described in the Notice of Privacy Practices, and that we will seek their written authorization for any other use or disclosure.

It is the right of the patient to expect, and our responsibility to maintain, patient confidentiality. Any patient consultations, case discussions or treatments are private and should be conducted discreetly. Patient-specific information should not be released or discussed unless it is necessary to serve the patient or required by law. This includes discussing patient information in and outside of St. Luke's.



What should I do?

My leader and I have been preparing for weeks for her big meeting today. The meeting is starting, and I cannot find her anywhere. I think her car is in the hospital parking lot. Even though I am not caring for her clinically, is it OK for me to check her medical record to see if she was admitted?

No. It's great that you want to help your leader, but it's against the law and our policy for you to look at a medical record unless you are authorized in writing to do so or need access to the information to do your job.

All patients – including your family, coworkers and public figures – have a right to privacy.

Patients' right to get information and to decline treatment

Patients have the right to get information from their medical provider regarding their illness and treatment. This will help patients make decisions about their care. Before a patient has a treatment or procedure that requires consent, our caregivers will make sure the provider has answered all the questions about the treatment or procedure. We invite patients who have more questions to ask our caregivers.

Patients have the right to say “no” to any treatment. If a patient does not want the treatment, we will tell them what could happen to their health as a result. We may also ask that patient to sign a form stating they do not want the recommended treatment.

We will tell patients, or when appropriate the family, about unexpected medical problems or outcomes that affect the patient's health.

Patients' right to respect and dignity

Our employees and health care providers will show respect, maintain patient dignity, and ensure that patients feel as comfortable as possible while receiving care from us. Good health care is a partnership. Patients have the right to participate in the development and implementation of their plan of care. We want patients and their families to make informed choices in that process. Patients can help by providing accurate and timely information to health care providers, asking questions, and following their individualized care plan.

Record retention, security and disposal

We must maintain and retain medical and business records in accordance with the law and our policies. Records subject to retention policies include paper documents such as letters and memoranda; computer-based information, such as email or computer files on server, disk or tape; and any other medium that contains information about St. Luke's or its business activities. We will maintain the integrity of records as required by policy, we will use and access them only for authorized purposes, and we will not destroy them before the time period specified under St. Luke's policies.





Confidentiality and network access agreement

The Health Insurance Portability and Accountability Act (HIPAA) Security Regulations require that we “ensure the confidentiality, integrity and availability of all electronic Protected Health Information (ePHI)” that we “create, receive, maintain or transmit.” Because of the HIPAA requirement, and the overall importance to maintain the integrity of all data, St. Luke’s has stringent policies regarding computer security. For example, it is considered a security violation for staff or contractors to log on using someone else’s ID. Additionally, it is unacceptable for staff or contractors to allow their ID and password to be used by anyone else. A key concept to remember is to only access, use and disclose confidential information as allowed and as required to perform job duties. Any attempt to circumvent the security system to perform functions or access data for which staff members or contractors have not been granted access is a security violation.

For staff and contractors with internet access, it is important to remember that the internet is to be used for business purposes only. St. Luke’s monitors internet use. Inappropriate or illegal use of the internet may lead to disciplinary action, up to and including dismissal.

St. Luke’s makes every effort to protect our employees, patients and records from cyber security threats. Staff and contractors are our partners in protecting the organization by using best practices when managing their email boxes and using the internet.

A Confidentiality and Network Access Agreement (CNAA) is one of the onboarding documents provided when individuals join St. Luke’s. Individuals must sign it to get network login credentials for St. Luke’s computer systems. Staff and contractors with internet access are required to review and re-acknowledge their obligation to abide by this agreement annually.

Use of technology

We adopt and upgrade technology in clinical and nonclinical areas when feasible to provide best-practice work tools and processes for staff, and value for patients.



Acceptable use

We encourage our employees, volunteers, trainees and contractors to make effective use of information technologies in support of patient care, communications, research and operations. Authorized access is intended only for these purposes. St. Luke's requires all members of the health system to use electronic communications and information in a responsible manner.

Protecting proprietary and confidential information

Intellectual property and proprietary and confidential information acquired or developed during the course of employment or association with St. Luke's must be protected. This includes, but is not limited to, various types of records and property, including personnel files, wage and salary information, financial information, cost data, strategic plans, information related to investigations or disciplinary actions, clinical and patient information and other business information.



We support a safe and accessible work environment.

Safe and healthy workplace

We are committed to providing a safe and healthy workplace. The use or threat of physical force or power against another person, group or community, or even oneself that is likely to cause injury, death or psychological harm is unacceptable. These acts against the safety of individuals or the organization may include intimidation, threats or acts of violence, theft or destruction of property, or any violence or activity involving employees or anyone else who comes in contact with our organization.

We are committed also to providing a drug and alcohol free work environment that emphasizes the safety and health of everyone who is associated with, or receives care from, St. Luke's. The use of drugs or alcohol, including the misuse of prescription medications, is not tolerated. We appreciate the serious consequences and risks associated with use of drugs and alcohol in our environment. Accordingly, we have implemented processes and procedures, such as the obligation to self-report, as specified in our policies.

Assistance with special needs

We provide reasonable accommodation to individuals with disabilities and to persons with religious or moral beliefs, needs or practices that conflict with their employment responsibilities. Applicants and employees should feel free to communicate with leaders and Human Resources without fear of discrimination or retaliation. Reasonable accommodations will be discussed when necessary and will be offered in good faith as required by law and St. Luke's policy.





What should I do?

My coworkers are very flirtatious, and their interactions have become distracting. I am avoiding my own workspace because it is impossible to get anything done around those two. I am scared to say anything because I cannot afford to get them annoyed with me or lose my job.

Your coworkers' conduct is creating a disruption in the workplace and could constitute prohibited harassment. You are strongly encouraged to report this behavior to your immediate supervisor or the Human Resources Department. St. Luke's adheres to a strong anti-retaliation policy. Efforts will be made to keep your complaint as confidential as possible.



We commit to keeping our patients safe and free from harm.

Culture of safety

Safety is our first priority. Whether in a St. Luke's hospital, clinic, or any care setting in our system, our caregivers have the patient's best interests at heart.

We are committed to providing quality care based on the Institute of Medicine's definition: safe, timely, efficient, effective, equitable, accessible and patient-centered care. Through reliable behaviors, following medical evidence, measuring and analyzing our data, and constantly improving our practices, we work toward the best possible outcome for each patient.

In addition to analyzing patient outcomes data, we survey our care teams, including physicians to measure different aspects of our patient safety culture. These responses help us proactively to prevent patient harm. A safety culture is shaped by organizational policies and practices, as well as the values and personalities of people in the organization. It is a collection of attitudes, behaviors and trust that, with assessment and improvement, can ensure everyone working in our organization, across the care continuum, delivers safety for our patients.

Badges

We ensure our employees and contractors are readily identifiable at all times. By requiring a St. Luke's badge to be worn above one's waist while on duty, we can quickly detect potentially unauthorized persons as well as safety hazards. Our badges also promote better communication and patient care while encouraging accountability.



What should I do?

My department utilizes traveler nurses who are employed by an outside agency. This morning I overheard two of the traveler nurses discussing getting high before work. I am concerned that they are caring for patients while under the influence. The nurses are not employees of St. Luke's, so what can I do?

St. Luke's must comply with the Drug-Free Workplace Act. Accordingly, this conduct needs to be reported immediately regardless of whether the individual is employed by St. Luke's. Follow our guidelines in the Reporting Concerns section on page 23.

We embrace innovation and strive to raise our standards through research, education and technology.

Clinical research

Research, by definition, is a systematic activity that formally tests new concepts in the form of a hypothesis. In the conduct of research, we require and apply rigor in following prescribed study methodologies with meticulous data collection and analyses. We also adhere to all federal regulatory requirements, state laws and internal policy and procedures establishing the highest standards for research conduct. Investigators and members of our research teams all receive mandatory education regarding research conduct, and we monitor studies for compliance through internal and external audits. Human subjects research, those studies that involve interaction, intervention and/or use of individual identifying information related to living individuals, requires approval by an Institutional Review Board (IRB) composed of scientific and non-scientific (lay person) members of our community. At a minimum, our research studies must show expected benefits greater than the perceived risks for the experiment, and risks must be minimized to the extent possible.

Participation in our research is voluntary and the result of an informed consent process that fully explains what participation entails for a research subject. Clinical research conducted at St. Luke's strongly embraces the I-CARE values of integrity (commitment to advancing science to benefit our patients), compassion (follows ethical principles including justice and beneficence), accountability (rigor of research conduct), respect (third principle cited in the Belmont report, the right to fully exercise autonomy), and excellence (formal scientific design and conduct of studies ensures a proven outcome with generalizable knowledge).



Before embarking on a project that may fall under the category of human subjects research, or if there is a need to discern whether a project is performance improvement/quality improvement vs human subjects research, a formal Research Determination from St. Luke's Research must be obtained. In addition, when using the electronic health record to identify patients for research or to create a database or registry, you must follow the St. Luke's policies related to these activities, all of which are based on federal guidelines designed to protect patient privacy. Lastly, as part of any research effort, you must not share patient information (PHI) with other entities outside of St. Luke's Health System without review and written approval. The Research Office is a source of information and guidance in all these related areas and may offer support when needed.

Education

We believe education is a fundamental building block in all aspects of our work. We are committed to providing access to educational materials and supportive programming to build the knowledge, skills and confidence necessary to make informed decisions and positive choices. Education is the foundation of our goals of improving the health of people in our communities, helping our patients recover and maintain their health, and for keeping our staff safe and advising them of the best, evidence-based health care practices. All our staff members are dedicated to continually evolving these processes and resources as it applies to their area of expertise.

A close-up photograph of a person's hand holding a blue credit card. The hand is positioned over a laptop keyboard, which is partially visible in the lower right. The background is blurred, showing a wooden desk and some greenery. The lighting is soft, creating a professional and focused atmosphere.

What should I do?

An individual who works in my department is frequently telling us about his participation in online auctions and the items he has bid on recently. Today I noticed that he spent more than 30 minutes bidding on an auction item while he was supposed to be caring for a patient. What should I do?

Report it. You should discuss your concerns with your supervisor or the compliance officer. You also can anonymously call the Compliance Hotline.

We report and resolve conduct that does not support our mission, vision and values.

Reporting Concerns

Everyone who works at St. Luke's, employed or contracted, has an obligation to report any situation that they believe to be unethical or illegal whether involving another employee or anyone acting on behalf of St. Luke's. Any potential concern should be reported to your supervisor through the normal chain of command, unless you believe that your supervisor is involved in improper conduct. If you believe your issue is not being handled appropriately, you may contact the Compliance Department, or make a report anonymously to the Compliance Hotline by calling toll-free 1-800-729-0966. Potential issues that should be reported by everyone at St. Luke's include any actual or suspected violation of the following:

1. Federal, state or local law, rule or regulation;
2. St. Luke's policies and procedures; or
3. St. Luke's Standards of Business Conduct

Reporting in good faith shows responsibility and a commitment to St. Luke's mission, vision, and values. St. Luke's enforces a non-retaliation policy. We protect employees from retaliation for making reasonable, good faith complaint(s) or participating in an investigation. Any St. Luke's employee or contractor, at any level, who engages in retaliatory behavior is subject to disciplinary action, up to and including termination from employment.

NOTE: Printed documents can become outdated. For the most recent version of our Standards of Business Conduct, please go online to stlukesonline.org.