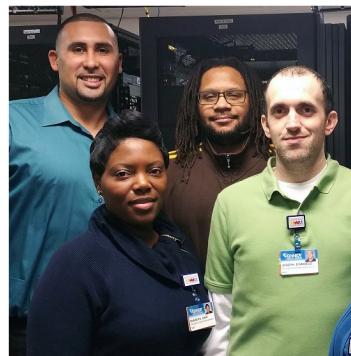


ONE JEFFERSON. ONE CODE.

Code of Conduct & Ethical Behavior



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A Message from Leadership

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

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

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

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



Stephen K. Klasko, MD, MBA
President and CEO



Stephen P. Crane
Chair of the Board of Trustees

A handwritten signature in blue ink that reads "Stephen K. Klasko".

A handwritten signature in blue ink that reads "Stephen P. Crane".

* Thomas Jefferson University includes Philadelphia University and Thomas Jefferson University. Jefferson Health includes Abington Health and its affiliates, Aria Health System and its affiliates, TJUH System and its affiliates, Kennedy Health System, Inc. and its affiliates, and Magee Rehabilitation Hospital.



— OUR MISSION —

WE
IMPROVE
LIVES.

— OUR VISION —

Reimagining health, education, and
discovery to create unparalleled value.

— OUR VALUES —



HOME OF SIDNEY KIMMEL MEDICAL COLLEGE

Responsibilities of All Members of the Jefferson Community

The Jefferson community includes members of the Board of Trustees, senior leadership, faculty, clinicians, researchers, administrators, employees, volunteers, contractors, and vendors. Since our Code represents Jefferson's official standards of conduct, we expect all members of the community to review, understand, and abide by it. The Code will not cover every situation you will encounter or every detail of our policies and procedures, but the guidelines on these pages are mandatory. You may use the Ethical Decisions Guide on page 5 to guide your decision-making, as appropriate.

RESPONSIBILITIES OF ALL MEMBERS OF THE JEFFERSON COMMUNITY

We must:

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

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

ADDITIONAL RESPONSIBILITIES OF LEADERS

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

- Respond appropriately when matters are brought to their attention.
- Set a personal example for high ethical standards in the performance of their duties.
- Clearly communicate expectations for high standards of ethical behavior and respect for all members of the Jefferson community.



- Apply the guidance set forth in our Code while supporting Jefferson's commitment to a fair and just culture.
- Encourage those they lead to ask questions and raise issues and concerns without fear of punishment.

ACKNOWLEDGEMENT PROCESS

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

Community members who do not comply with annual certification requirements will be subject to disciplinary action. Support of the Code and participation in related training programs may be considered in decisions regarding hiring, promotion, and performance evaluation for all members of the Jefferson community.

Reporting Concerns

WHEN YOU SEE SOMETHING SAY SOMETHING

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

WHERE TO FIND HELP

STEP 1: IMMEDIATE SUPERVISOR

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

STEP 2: A HIGHER-LEVEL MANAGER OR LEADER

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

STEP 3: HUMAN RESOURCES

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

STEP 4: OFFICE OF LEGAL AFFAIRS

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

STEP 5: COMPLIANCE OFFICE

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

YOUR LOCAL COMPLIANCE OFFICER

Please visit the Compliance Community online for information about your Compliance Officer.

LEGAL REQUIREMENTS

Jefferson is committed to integrity and abiding by all laws and regulatory requirements. Violations of the law will not be tolerated. Anyone with knowledge or suspicion of fraud, waste, or abuse or other wrongdoing has a responsibility to report it. Violations of state and federal laws are punishable by imprisonment and carry fines and penalties. You may report any suspected fraud against the government directly to a government agency or to your local Compliance Officer.

ANONYMOUS REPORTING: KEY FACTS ABOUT THE JEFFERSON ALERTLINE

You may report your concerns by using Jefferson's Alertline.

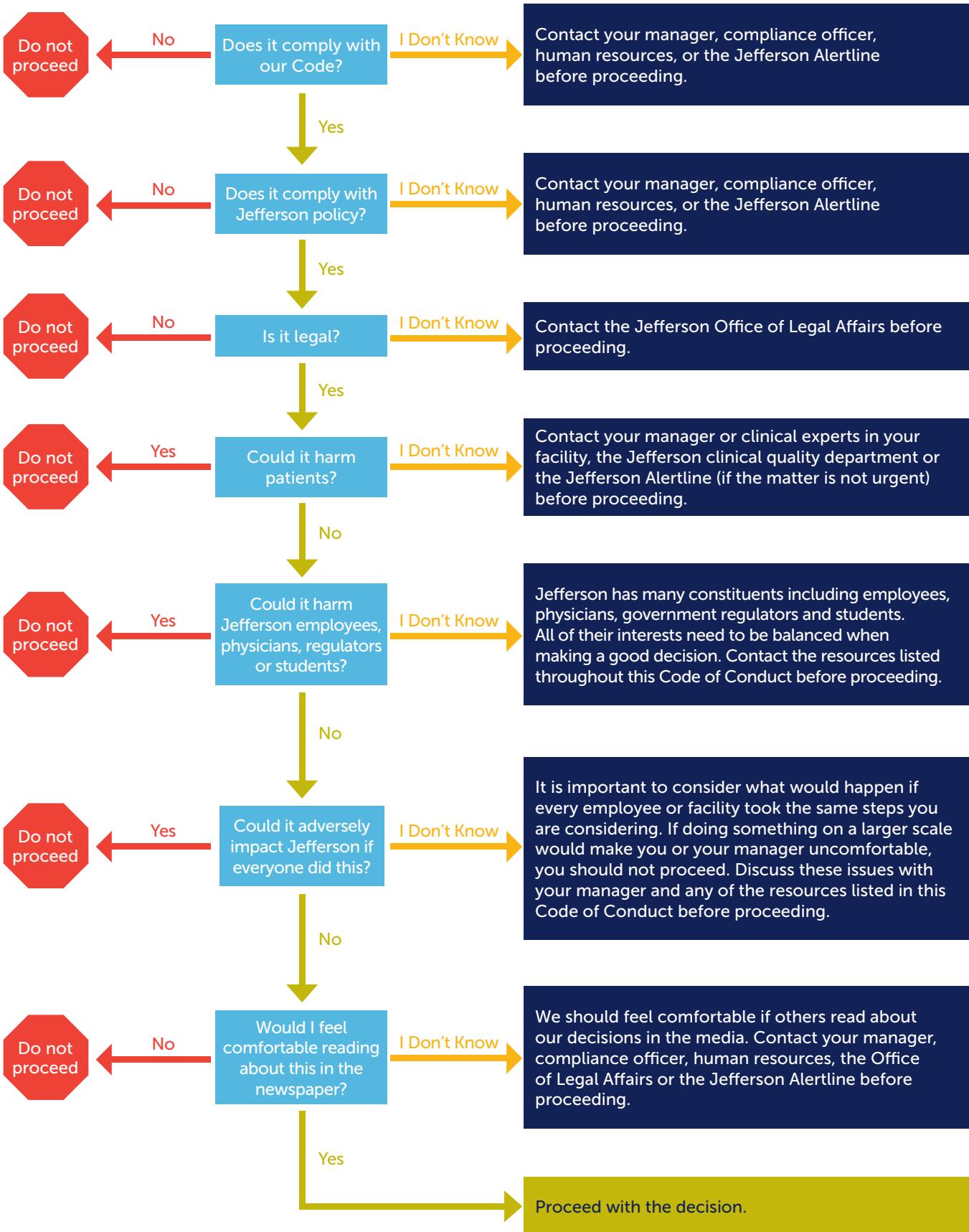
- An outside company that is not related to Jefferson manages the Alertline 24 hours a day, seven days a week.
- You can call the Alertline at 888-5-COMPLY (888-526-6759) or file a report online at **Jefferson.Alertline.com**. The system does not record calls, trace reports, or use caller ID.
- If you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

PROTECTION FOR GOOD FAITH REPORTING

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

Ethical Decisions Guide

Use this tool to assist you in making ethical decisions consistent with Jefferson's values:



Upholding Our Code of Conduct

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

The following behaviors represent potential violations of the Code:

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

DISCIPLINARY ACTION

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

ADDITIONAL REPORTING INFORMATION

PATIENT CONCERN

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

CLINICAL AND PATIENT SAFETY

You must report all concerns about patient safety in clinical care. Utilize your local electronic or telephonic



reporting systems for real-time reporting to Jefferson's quality and safety departments for handling.

UNSAFE WORK-RELATED CONDITIONS

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

STUDENT SEXUAL MISCONDUCT

The appropriate personnel who have been made aware of instances of student sexual misconduct are required to report the incident under Title IX, a federal law. Contact your local Title IX Coordinator regarding all Title IX-related matters.

PRIVACY

Contact your local Privacy Officer to report actual and suspected breaches of patient Protected Health Information.

COMPLIANCE

You may contact your local compliance office directly to report Code of Conduct violations or other potential compliance violations. Visit the Compliance Community online for information about your local compliance office.

Treat all Members of the Jefferson Community with Respect and Fairness

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

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

GLOSSARY

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

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

Harassment may include:

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

Each person covered under the Code is expected to:

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



TEST YOUR UNDERSTANDING

Sam and Jeanette work in separate departments but on the same floor. Occasionally they see each other and exchange a few pleasantries. Last week, Sam asked Jeanette to get a drink after work. Jeanette declined, telling Sam she wants to keep their relationship professional. A week later, Sam asked Jeanette out again and squeezed her shoulder while he stood very close to her during the conversation. Jeanette knows Sam is well-liked in his department and is friends with her supervisor. She also wants Sam to stop. What should Jeanette do?

GUIDANCE FROM OUR CODE

Sam's invitations are making Jeanette uncomfortable. Once Jeanette made it clear that his invitation was unwelcome, Sam's actions should no longer continue and may constitute sexual harassment. Jeanette can report Sam's behavior to her supervisor and ask for his assistance in stopping Sam's advances. If she is uncomfortable doing so, she should contact Human Resources for assistance. Jefferson will not tolerate harassment of any member of our community.

Exercise Honesty and Integrity

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

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

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

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

If something does not feel right, then it might not be the right thing to do. Use the Ethical Decisions Guide (page 5) when challenges arise to assist you in acting with integrity. Ask yourself:

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



GLOSSARY

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

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



TEST YOUR UNDERSTANDING

Amir has avoided completing his mandatory online training and on the last day to complete it, he is out sick. He asks his co-worker Bill, to complete the training for him using his computer login information, but Bill says no. A few days later, Bill overhears Amir thanking Marisol for doing a “huge favor” for him and Bill suspects the comment relates to the training. Should Bill ignore what he overheard?

GUIDANCE FROM OUR CODE

Bill has a duty to report his suspicion that Amir and Marisol provided false information about required training. All members of the Jefferson community must speak up and report concerns about activities that may compromise personal or institutional integrity. If he is uncomfortable making the report to their department leader, Bill can file a confidential, good faith report with Human Resources or through the Jefferson Alertline. Employees and leaders must always perform their duties in an honest and professional manner.

Maintain the Highest Standards of Patient Care

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

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

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

GLOSSARY

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



TEST YOUR UNDERSTANDING

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

GUIDANCE FROM OUR CODE

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

Maintain Confidentiality of Information and Records

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

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

Following specific policy requirements, Jefferson community members must:

- Know who is and is not permitted to access confidential or otherwise protected information;



TEST YOUR UNDERSTANDING

A colleague who works in the hospital told you that a professional athlete came to Jefferson for treatment. Your colleague is not involved in the patient's care but has access to the medical record. He told you that he took a quick look in the athlete's medical records and based on what he saw, believes the athlete's condition will impact the team's performance next year. What should you do next?

GUIDANCE FROM OUR CODE

Your colleague's actions violate HIPAA guidelines and Jefferson policy. You may not want to get him in trouble, but such actions must be reported. You must contact the Privacy Officer directly or through the Jefferson Alertline to report this incident. You must never access patient information unless you are involved in the patient's care or operations related to their care. You should only access the minimum amount necessary to perform the function that relates to your work.

- Prevent unauthorized disclosures of confidential information;
- Safeguard usernames and passwords;
- Access, use, and share only the minimum amount of patient and/or student information authorized to complete your job duties and responsibilities; and
- Never leave confidential or protected information unattended or place them in unsecured bins.

Members of the Jefferson community will be subject to disciplinary action, up to and including termination of employment or contract for the unauthorized access, use, or disclosure of confidential or protected information.

GLOSSARY

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

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

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

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

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

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

CONFLICTS OF INTEREST

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

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

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

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

MAINTAINING LEGAL AND ETHICAL STANDARDS IN BUSINESS TRANSACTIONS

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

GLOSSARY

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

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

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

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

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



TEST YOUR UNDERSTANDING

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

GUIDANCE FROM OUR CODE

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

Uphold the Highest Standards of Academic and Research Integrity

ACADEMIC INTEGRITY

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

RESEARCH INTEGRITY

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

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

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



Center City Campus



TEST YOUR UNDERSTANDING

Jamie is a post-doc working closely with an Assistant Professor. The Assistant Professor recently submitted manuscripts about his research to a few journals for publication. He provided Jamie a list of expert references to use when responding to journal editor inquiries.

Several weeks later, the Assistant Professor gave Jamie access to his personal email account to search for an old email. When Jamie looked for the item, he saw emails addressed to the same names that he sent to the journal editors. It appeared that the Assistant Professor made up the names and routed the inquiries to his personal email account. What now?

GUIDANCE FROM OUR CODE

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

Maintain a Relationship of Integrity with Each Payer

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

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



TEST YOUR UNDERSTANDING

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

GUIDANCE FROM OUR CODE

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



New Jersey Campus

GLOSSARY

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

Conduct Political Activity and Governmental Activity in Accordance with the Law

PARTICIPATING IN POLITICAL ELECTIONS

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

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

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

RESPONDING TO GOVERNMENT INQUIRIES

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

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

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



Northeast Campus



TEST YOUR UNDERSTANDING

Samantha is a Research Coordinator at Jefferson. She recently launched a website as part of her campaign for a seat on the local school board. She asked her coworker Ray to review the site and tell her what he thinks about it. Ray notices that some of the photos show Samantha in her office and the Jefferson name and logo are visible. He suggested that Samantha replace the photos but she wants people to know that she works for Jefferson. How should Ray proceed?

GUIDANCE FROM OUR CODE

Ray should talk to his supervisor, another leader in the Department, or contact his local Compliance Office to report the use of the photos on the site. Samantha may not use her Jefferson relationship or Jefferson's resources in support of her campaign. Use of the Jefferson name or logo may give the appearance that Jefferson supports Samantha's campaign and can place at risk our tax-exempt status.

Foster a Safe and Healthy Environment

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

PATIENT SAFETY

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

OCCUPATIONAL SAFETY

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

PERSONAL SAFETY

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

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



TEST YOUR UNDERSTANDING

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

GUIDANCE FROM OUR CODE

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

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Together...

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

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

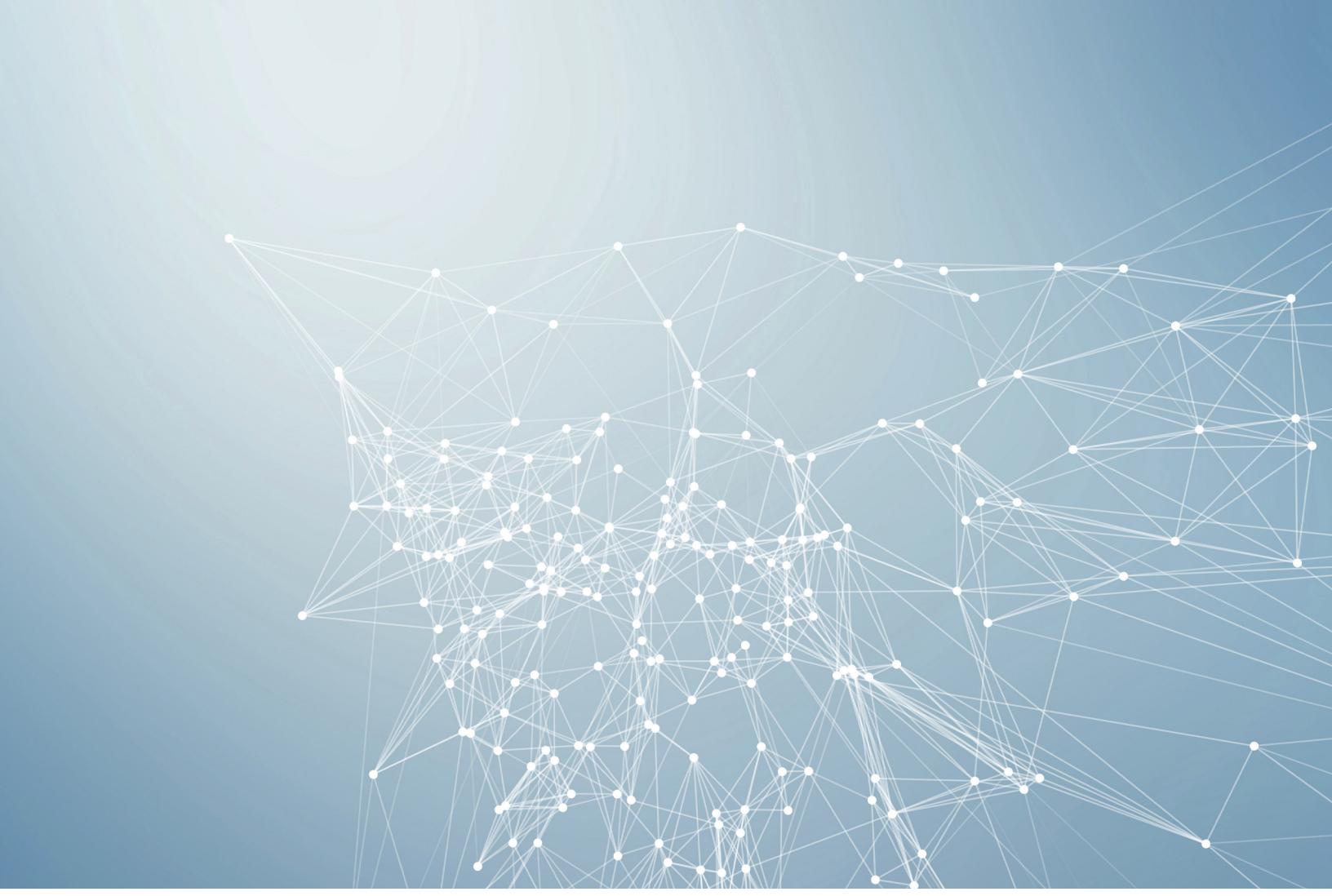


Safely report any violations or get more information by contacting the hotline.

Online:
Jefferson.alertline.com

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