THE ASCENSION HEALTH
CORPORATE RESPONSIBILITY PROGRAM

A MISSION
BASED ON
VALUES AND ETHICS
Ascension Health, its local health ministries, associates and agents are committed to carrying out their health care ministry in a manner consistent with the Ascension Health Mission, Vision and Values. We are dedicated to following a high ethical standard of individual conduct as well as to acting as a responsible corporate citizen. In support of these commitments, the Board of Directors of Ascension Health has formally established a Corporate Responsibility Program to:

- Promote good corporate citizenship
- Identify high-risk areas
- Prevent and detect ethical violations
- Comply with Federal, State, and Local laws

This booklet contains information about the foundation of our Corporate Responsibility Program. It details the Mission, Vision and Values of our health ministry; explains the Standards of Conduct we are responsible for practicing; and explains the Ascension Health Values Line, a confidential phone service available to report ethical and legal issues.
**Ascension Health**

**Mission, Vision and Values**

**Our Mission:**
Rooted in the loving ministry of Jesus as healer, we commit ourselves to servicing all persons with special attention to those who are poor and vulnerable. Our Catholic health ministry is dedicated to spiritually centered, holistic care that sustains and improves the health of individuals and communities. We are advocates for a compassionate and just society through our actions and our words.

**Our Vision:**
We envision a strong, vibrant, Catholic health ministry in the United States, united in service and healing. From the spiritual core of our heritage and tradition, we will:

*Emphasize* the provision of services, which advance health within local communities through ministries defined by service, reverence, integrity, wisdom, creativity and dedication.

*Maximize* the potential of our system by strengthening the dynamic relationship among stewardship, interdependent ministries, and system services.

*Celebrate* in our everyday service to others, the rich gifts and legacies of our sponsors.

*Unite* with others to strengthen the Catholic health ministry through growth and partnerships.

*Partner* with associates, physician, and other committed to a care continuum that is spiritually centered, accessible, appropriate and affordable, especially for persons poor and vulnerable.

*Expand* the role of laity, in both leadership and sponsorship, to ensure a Catholic health ministry of the future.

*Appreciate* each person and his/her spirituality through a culture that reflects our values, respects diversity, reveres learning and embraces innovation.

*Advocate* through ideas, influence and actions for a society that strengthens the fabric of community and respects the dignity of each person.

*Lead* the transformation of health care to service that is committed to all aspects of health and well-being for the betterment of communities and that responds to the needs of individuals throughout the cycle of life.
Our Values
We are called to:

*Service of the Poor* – generosity of spirit, especially for persons most in need

*Reverence* – respect and compassion for the dignity and diversity of life

*Integrity* – inspiring trust through personal leadership

*Wisdom* – integrating excellence and stewardship

*Creativity* – courageous innovation

*Dedication* – affirming the hope and joy of our ministry
The following Standards of Conduct are a practical extension of Ascension Health’s Mission, Vision and Values. They more clearly state Ascension Health’s expectations for how associates should conduct themselves to promote and protect the integrity of Ascension Health. Each associate is expected to act in a manner consistent with the standards on the following pages. As you read these standards, keep in mind that references to “Ascension Health” and “We” include all administrators, associates, Medical Staff members, leased employees, and volunteers of Ascension Health and its local health ministries.


**Standards of Conduct**

**Quality of Care:**

A central concern of Ascension Health in meeting patient needs is serving the whole person in his or her spiritual, intellectual, emotional and physical dimensions. Ascension Health is committed to providing competent and compassionate care, to respect and safeguard the dignity of the patient, and to allow patients access to all the medical and ethical information necessary to make decisions about their care.

- We treat the person rather than the disease.
- We allow patients to participate in decisions regarding their care by providing them with information in a manner that they can understand.
- We respect and maintain the dignity of every patient and strive to provide care in a manner sensitive to cultural differences and individual desires.
- We provide appropriate care based on the patient’s medical need, without regard to race, religion, national origin, age, sex, sexual orientation, disability, ability to pay, or any classification protected by law.
- We provide medically necessary care that is properly documented in the patient’s medical record.
- We maintain competencies related to our job responsibilities and exercise appropriate judgment and objectivity when providing patient care.
- We report situations that compromise quality through the appropriate, established channels, and correct the situations as soon as possible.
Law and Regulations:  
Ascension Health will operate in accordance with all laws and regulations. These laws and regulations apply to areas such as patient referrals, employment, physician relationships, billing and payment practices, discount arrangements, lobbying, political contributions, the environment, health and safety, and dealings with payors and regulatory agencies.

- We refrain from conduct that may violate federal or state fraud, abuse, and false claims laws.
- We prohibit any type of payment for or receipt of kickbacks or bribes for the purpose of inducing referrals in violation of the anti-kickback statute, Stark physician self-referral law, or other federal or state statutes or regulations.
- We recruit, hire, train, promote, assign, transfer, layoff, recall and terminate employees based on their own abilities, achievements, experience and conduct without regard to race, religion, national origin, age, sex, sexual orientation, disability, ability to pay, or any classification protected by law.
- We provide associates with the necessary training and education to perform their duties in accordance with applicable laws and regulations.
- We establish relationships only with only those individuals or entities who have not been excluded from participation in federal healthcare programs.
- We take steps to ensure that our billing and coding are in compliance with our policies, federal and state laws, and regulations and are supported by documentation in the medical record.
- We do not engage in activities that may jeopardize the tax-exempt status of the organization, including certain lobbying and political activities, activities that further the private or personal interests of an individual rather than our charitable purpose, and any antitrust activity that may attempt to regulate competition.
- We make certain that reports or other information required to be provided to any federal, state or local government agency are filed accurately and in conformance with the applicable laws and regulations governing such reports or other information, to the best of our knowledge and understanding.
- We follow applicable environmental, health and safety requirements in the planning of facilities and the running of all equipment, operations, and establishment of procedures.
- We report any practice or condition that may violate laws, rules or regulations, safety standards, internal policy or Standards of Conduct to appropriate levels of management in a timely manner.
Human Resources:
Ascension Health strives to cultivate a work environment where employees are highly regarded; where they are treated honestly and respectfully; where their health and safety are protected; where they are motivated to reach their potential; where they are given the opportunity for personal and career learning and advancement; where they are provided with opportunities to participate in decisions that affect their working conditions; where they are provided with the tools necessary to do their jobs well; where there are safe and adequate procedures for resolving conflicts; and where employees are recognized and rewarded for their achievements, without prejudice or discrimination.

- We do not tolerate any form of harassment or discrimination.
- We seek to be a responsible employer by providing opportunities for professional satisfaction, pride of work and career growth.
- We keep employees informed of activities and events that affect their specific work environment and performance of their job duties.
- We provide training opportunities for employees to obtain and maintain certifications or licensures necessary for the performance of their job duties.
- We maintain a drug free workplace and will not tolerate the use or possession of illegally acquired drugs and/or alcoholic substances while employees are on duty.
- We function in an environmentally responsible manner, providing for the health and safety of our employees as well as our patients and the community.
- We provide a grievance process to report and resolve conflicts without fear of retribution.

The information provided above does not encompass all Human Resource Policies and Procedures. A copy of the Human Resources Policies and Procedures Manual is available from the local health ministry’s Human Resources Department.
Business and Ethical Practices:

Ascension Health is committed to ethical business conduct and integrity, including the Ethical and Religious Directives for Catholic Health Care Services. Employees must represent Ascension Health accurately and honestly and must not do anything that purposely defrauds anyone, including other companies or the government, of money, property, or services. Record keeping and billing for services provided to patients must be accurate, timely and lawful. Employees must take all reasonable steps to preserve and protect Ascension Health’s assets by making prudent and effective use of its resources, and properly and accurately reporting its financial condition.

- We maintain respect for all life within the culture of Ascension Health and its local health ministries.
- We do not pursue any business opportunity that requires engagement in unethical or illegal activity.
- We act in good faith and in the interest of Ascension Health at all times in the performance of our job duties.
- We appropriately document the care that is provided.
- We submit claims only for medically necessary services and supplies ordered by a physician, or legally authorized individual and provided to the patient.
- We do not steal or misappropriate confidential or proprietary information belonging to another person or entity.
- We use resources and assets only to further the ministry and mission of Ascension Health.
- We do not use “insider” information for any business activity conducted by or on behalf of Ascension Health or its local health ministries.
- We do not offer, give, solicit or receive any form of bribe or other improper payment.
- We make certain that payments and other transactions are properly authorized by management and properly documented in the books and records.
- We ensure that all financial documents, including financial statements, cost reports, accounting records, expense reports, and time sheets, clearly represent the relevant facts or true nature of all transactions.
- We ensure all dealings with payors and regulatory agencies are conducted honestly and accurately.
**Confidentiality:**

In keeping with various laws, regulations, professional ethical guidelines and the Ethical and Religious Directives for Catholic Health Care Services, Ascension Health employees must maintain the confidentiality of medical records and other patient information. Employees are also expected to keep confidential information about other employees and the proprietary business practices of the organization.

- We protect and respect the confidentiality of each patient and their medical information.
- We only reveal personal or confidential information concerning patients if legitimate business or patient care purposes support the request for information. The patient authorization for the release of the information is obtained, if appropriate.
- We only share sensitive information regarding the operations of Ascension Health or its local health ministries with associates when they have a legitimate need to know the information in order to perform their job responsibilities.
- We will take precautions to maintain and manage all intellectual property, including patents, trademarks, copyright and software, to protect its value.
- We will maintain information including financial data and employee related information in a confidential, secure manner according to relevant policies.
Conflicts of Interest:
Ascension Health employees are expected to act in a manner that is in the best interest of the organization and the patients it serves. Employees may not use their positions to profit personally or to assist others in profiting in any way at the expense of the organization. In any situation where an employee’s outside interests conflict with those of the organization, the employee must disclose the conflict in accordance with organizational policy.

- We avoid engaging in any activity, practice or act that appears to conflict with the interests of Ascension Health.
- We do not solicit or accept money or gifts from patients or suppliers of more than a nominal value.
- We do not accept gifts, favors, services, entertainment or other things of value to the extent that the acceptance influences or creates an impression of influencing decision-making.
- We abstain from any decision or discussion affecting Ascension Health when serving as a member of an outside organization or board.
- We do business only with individuals and companies on the basis of the best interests of Ascension Health.
- We prohibit the disclosure of proprietary and sensitive information to any unauthorized person or the use of such information for personal benefit.
- We avoid outside employment and consulting or other personal investments if it could affect our job responsibilities or unduly influence the decision making process.
Conclusion

Our Mission, Vision and Values, along with our Standards of Conduct and Values Line provide the foundation for our Corporate Responsibility Program. If you need guidance concerning any information in this booklet or you believe you are aware of a situation that may be illegal or unethical, you are expected to take action. As a first step, you are encouraged to take to your supervisor or manager. If you are uncomfortable with going to your supervisor or if you do not get advice you can use, then contact the Corporate Responsibility Officer for your local health ministry or call the Values Line to make a confidential report.

As evidence of your commitment to the Ascension Health Standards of Conduct and Corporate Responsibility Program, please detach the Receipt and Acknowledgment form at the perforated line and sign and complete the form. Please return your form to your supervisor. This lets us know we are all committed to carrying out the health ministry of Ascension Health in an ethical and legal manner.

Please detach the Values Line wallet card as well. It fits easily into your purse or wallet. Carry it as a reminder of your responsibility to report any problems or concerns. You may remain anonymous and no direct or indirect actions will be taken against you if you report your concern in good faith.