Presbyterian
Code of Conduct

Approved by the PHS Board of Directors
August 2020
A message from our President & CEO

Every day members of the communities we serve come to Presbyterian for their healthcare, as either patients, members or visitors. This is often a very vulnerable time in their lives and they count on us to help ease the way to better health.

Presbyterian is committed to improving the health of the patients, members and communities we serve. The community trusts us to conduct our work in an ethical manner, to do what we say we will do and to uphold the standards necessary to meet the ever-changing requirements of healthcare.

This responsibility belongs to both the organization and to each of us as members of the workforce. Each individual’s actions reflect our commitment to ethical behavior as well as treating others with fairness and respect. The Presbyterian Code of Conduct identifies the basic principles Presbyterian requires of its workforce in order to earn and maintain the trust of our patients, members, employees, communities and business partners.

This Code provides guidance, but does not address every situation in our complex and heavily regulated environment. We expect you to ask questions and use good judgement. If you have questions or concerns about a situation, please contact your manager, the Compliance Department or Human Resources.

Thank you for all you do for Presbyterian and for the communities we serve.

Dale Maxwell, President & CEO
Presbyterian’s purpose
Presbyterian exists to improve the health of the patients, members and communities we serve.

Values
Our values are the commitments we make to each other as members of the Presbyterian team. We call these our CARES Commitments. In honoring our mission-based legacy, we commit to:

- **Collaborate** Bring my best to support individual and team success.
- **be Accountable** Keep my commitments and earn trust.
- **Respect** Honor each other, listen and speak honestly.
- **Engage** Participate fully with a passion for excellence.
- **Serve** Be dedicated to patients, members and each other.

Our Promise
The Presbyterian Promise is an expression of our commitment to provide an exceptional experience for our patients and members.

We Promise:
- To know you, respect you, listen to you and treat you with compassion.
- To ease the way to your best health.
- To provide you with the highest quality care at the lowest possible cost.
- To communicate clearly and accurately, coordinate your care and involve you in decisions.
- To do what we say we will do.

Unified in our purpose, strengthened by our differences
We commit to an inclusive and equitable environment where everyone is valued and empowered for success. Our environment reflects the diversity of our community, learns from all perspectives, provides affordable, accessible and culturally appropriate healthcare and champions health equity for our New Mexico communities.
Culture of safety & wellness

- Promote a culture of safety through individual and organizational behavior based on shared beliefs and values.
  - Always seek to eliminate patient and member harm.
  - Strive for a safe work environment free of preventable infectious disease exposures, preventable lifting related injuries, workplace violence and staff harm.
  - Maintain a Just Culture to encourage the routine reporting of errors or concerns, without fear of retaliation and to facilitate organizational process improvements so we may better serve our workforce, patients, families, members and communities.
- Support the safety and wellness of our workforce through wellness programs, including support for a healthy life and work balance.

Uphold ethical & regulatory standards

- Seek the best course of action in every situation and, when challenged with ethical dilemmas, obtain the advice and direction of supervisors, managers or senior leaders.
- Protect and uphold Presbyterian’s reputation and legacy for integrity and community service in all personal and professional actions.
- Adhere to all laws and regulations. Uphold an atmosphere that promotes and supports Presbyterian’s efforts to ensure compliance with laws and regulations.
- Know and abide by Presbyterian policies as they serve as guides to understanding how Presbyterian does business in a highly regulated industry.
- Be watchful in preventing fraud, waste and abuse of the resources entrusted to us by our patients and members.
- Complete annual training as required.
- Uphold our Code of Conduct as it applies to all members of the Presbyterian workforce.
- Understand that violations of our Code of Conduct or underlying federal or state laws, regulations, or Presbyterian policies could result in corrective action up to or including termination of employment, suspension of privileges, or termination of business relationships.
- Retain documents, email, data and other records for the appropriate and legally required length of time in accordance with record management policies.

Workforce includes leaders, employees, independent practitioners, contractors, volunteers, students, vendors & board members.

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Respect everyone

- Promote positive behaviors and work environments. Disruptive and/or harassing behaviors, intimidation or retaliation by individuals at any level of the organization will not be tolerated. Leadership will address such behaviors with all members of the workforce.
- Honor patients’ and members’ rights to participate in and make decisions about their care, including the right to refuse care when permitted by law.
- Inform patients and members about their illness, treatment plan, pain management, treatment alternatives and outcomes in a manner they can understand.
- Provide interpretation services when needed.
- Identify yourself to patients and members by providing your name, your role and your purpose for the interaction.
- Listen to and document patients’ and members’ concerns and complaints so they can be addressed.
- Respect and listen to colleague’s perspectives, in order to provide the best care or service possible.
- Promote a framework of trust that enables teams to work well together and build mutual trust.

Protect privacy & confidentiality

- Safeguard the privacy of patient and member information. Although Presbyterian collects information about our patients and members, we do not access, use or discuss this information with others unless it is allowed by privacy laws.
- Protect confidential customer and organizational information in accordance with privacy and security policies.
- Safeguard patient and member information by not posting their information or pictures to a website, social media site or public forum, even if the patient is not identified.
- Protect patient, member and employee data by only accessing, using and sharing internally or externally in accordance with privacy and antitrust regulations.
- Safeguard our workforce’s information and records in the same manner we would for patients and members.

Workforce includes leaders, employees, independent practitioners, contractors, volunteers, students, vendors & board members.

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Abide by the law, professional licensure & privileging

- Abide by all federal and state laws including those that relate to members, patient referrals and provider relationships.
- Report to work or volunteer free from alcohol, drugs or other controlled substances that affect job performance and/or safety.
- Comply with all federal and state laws, regulations and policies related to environmental health and safety, including fire, chemical, biological, ergonomic, radiation, and electrical safety and appropriately handle, transport and dispose of medical waste and other hazardous materials.
  - Ensure all licensure and certification required to provide safe patient care are current and renewed in a timely manner.
  - Provide only those services within your licensure or scope of practice and for which you are privileged to perform at Presbyterian.
  - Ensure all reporting to the government is truthful and accurate and never give false or misleading information to a government employee, agent or person representing a government agency.
  - Comply with the Health Insurance Portability and Accountability Act (HIPAA).
  - Not employ or contract with ineligible parties in accordance with the Excluded Individuals and Entities policy.

Maintain financial integrity

- Manage with integrity and prudence Presbyterian’s financial and other resources. Hold other Presbyterian workforce members accountable for doing the same. Do not violate laws pertaining to fraud, waste and abuse of government funds.
- Ensure charges are submitted only for services or supplies provided to the patient or member, accurately represent the level of service provided to the patient or member and have proper documentation and coding.
- Support internal and external audits and recommendations, and assist with any corrective actions.
- Conduct all negotiations and contracting in accordance with federal, state and local laws and regulations.
Address conflicts of interest

- Identify situations where your personal interests may appear to conflict with Presbyterian’s interests.
- Disclose the situation to your manager and complete the Conflict of Interest Disclosure form.
- Withdraw yourself from making decisions that may appear as a conflict.
- Refuse to accept or offer gifts or benefits or enter into relationships with individuals, competitors, vendors, suppliers or contractors (such as pharmaceutical and medical device companies) that may influence or be perceived to influence a decision or action taken on behalf of Presbyterian in accordance with conflict of interest policies.

Further, we expect leaders to set the example by committing to:

- Act with unquestionable integrity.
- Investigate suspected legal and ethical violations in accordance with the Compliance Reporting and Investigation policy. Take corrective action when violations occur in accordance with corrective action policies.
- Create a culture of compliance, safety and quality. Implement changes for identified problems, as appropriate.
- Provide opportunities for workforce members to participate in compliance, safety and quality initiatives.
- Manage disruptive and inappropriate behaviors according to Presbyterian policies.
- Provide patients and members the means to report their concerns about compliance, safety and quality.
- Uphold Presbyterian’s ethical work environment and never exempt any employee from state or federal laws.
- Provide education that focuses on compliance, safety and quality.
- Create an environment free of harassment and discrimination, supporting diversity and inclusion.
- Treat workforce with respect and listen to their ideas. When possible, involve workforce in decisions impacting their work.
See something, say something

If you see something that does not seem right, we want to make sure it gets corrected. All workforce members have a duty to report compliance concerns. This includes the following behaviors:

- Unethical or prohibited behavior including actual or suspected unethical behavior, illegal activity or violation of Presbyterian policies and procedures;
- Disruptive or inappropriate behavior including disrespectful language, sexual comments, inappropriate touching, anger outbursts, name-calling, racial or ethnic jokes or slurs, intimidation, or the deliberate failure to follow policies, address safety concerns or patient care needs;
- Action or inaction that may pose a danger to patients or members, or result in substandard care;
- Any retaliation for raising or reporting ethical, compliance or other concerns. Retaliation is not allowed, no matter the status or tenure of the person responsible for the retaliation. Individuals who report concerns in good faith are protected from retaliation.

Presbyterian’s Compliance Department takes all concerns seriously and will follow up and take appropriate actions on all reports. All reports are treated confidentially, as the law allows.

There are several ways to report. Contact:

- Your supervisor, manager or senior leader;
- Presbyterian’s Compliance Department;
- Compliance and Fraud, Waste and Abuse Hotline (888) 435-4361 (anonymous); or
- Human Resources through AskHR (505) 923-8750.

The Compliance and Fraud, Waste and Abuse Hotline is available 24 hours a day, 365 days a year. An independent company answers all Hotline calls and you may stay anonymous. Those who choose to give their names will have their identity protected to the extent allowed by law. If you call, please give enough details to investigate your concerns.

For more information about Presbyterian’s compliance program, visit the Compliance Department’s PresNet page.
Workforce commitment
As a member of the Presbyterian team, I acknowledge that I have read the Code of Conduct. I agree to support the values of Presbyterian and to abide by the standards above. I understand I will be held accountable if I fail to do so. I also understand that compliance with regulatory requirements is everyone’s responsibility.

____________________________________
Signature

____________________________________
Date