Baptist Health South Florida

POLICY NO.: BHSF-819

☑ Administrative
☐ Departmental

SUBMITTED BY:

Beth Gillis
Title: Corporate Assistant Vice President, Compliance

APPROVED BY:

Wendy Kemp
Title: Corporate Assistant Vice President, Audit

Responsible Department: Audit and Compliance

APPROVED BY:

Karen Brady
Title: Corporate Vice President and Chief Compliance Officer

Creation Date: 12/05
Review Date: 03/07, 11/10, 09/11
Revision Date:
Post Date: 10/11/11

POLICY TITLE:
Code of Ethics

SUMMARY & PURPOSE:
To describe the purpose of the Code of Ethics as well as defining each employee's access to and responsibility under the Code.

POLICY:
Baptist Health's Code of Ethics is a key component of the Corporate Compliance Program. It reflects the core values and principles that guide Baptist Health operations.

SCOPE/APPLICABILITY:
This policy applies to all Baptist Health South Florida employees.

PROCEDURES TO ENSURE COMPLIANCE:
The Code of Ethics:

- Establishes a code of ethical and legal conduct, standards and procedures to be followed by all employees;
- Communicates to all employees the standards and procedures they are expected to follow;
- Clarifies methods of reporting issues and concerns within the corporate structure in order to prevent, detect and correct violations of laws, regulations and corporate policies that would detract from Baptist Health's Code of Ethics;
- Documents Baptist Health's commitment to the highest ethical and professional standards.

All employees are required to adhere to the principles set forth in the Code of Ethics.

Failure to comply with the Code is a serious matter that may lead to disciplinary action up to and including termination and/or legal prosecution.

The Code is distributed to each new employee at New Employee Orientation.

The Code will be updated and distributed periodically to all employees, medical staff members, Board members and vendors.

The Code is available to all employees on the intranet.

SUPPORTING/REFERENCE DOCUMENTATION:

- United States Federal Sentencing Guidelines
- Office of Inspector General Compliance Program Guidance for Hospital
- Office of Inspector General Supplemental Compliance Program Guidance for Hospitals

RELATED POLICIES, PROCEDURES, AND ASSOCIATED FORMS:

- BHSF Administrative Policy: 801 Department Responsibilities and Charter– Audit and Compliance
- BHSF Administrative Policy: 820 Appropriate Discipline for Compliance Program Violations – Audit and Compliance

ENFORCEMENT & SANCTIONS:

Violations are assessed by the Corporate Vice President and Chief Compliance Officer who in collaboration with Human Resources recommends the appropriate discipline to senior management or the Board of Trustees if the person subject to discipline is at an executive level.