Service Excellence Performance Standards

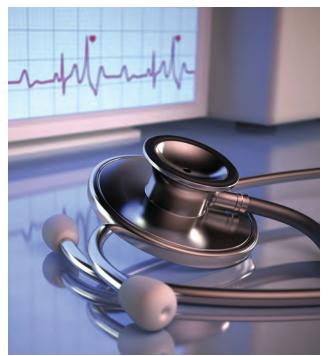
MERCYCARE SERVICE CORPORATION

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Service Excellence Performance Standards

President's Message

These Service Excellence Performance Standards, developed by your peers, are the essence of Mercy and drive our delivery of service. Each of us is individually responsible for our behavior and actions. I am confident that, by accepting the invitation to join this exceptional organization, you are ready to accept the responsibility of consistently carrying out these standards. They contribute to the care of ourselves, our peers, and our patients. I am thankful you have accepted this obligation for which we have been entrusted.

In addition to supporting our mission, vision and values, the Service Excellence Performance Standards-Code of Conduct also assist in ensuring that our actions and behaviors are consistent with our numerous ethical, legal and professional obligations.

These standards apply to all employees, contract workers, volunteers, medical staff members and board members of Mercy. Please read them carefully, as they illustrate how each of us is expected to bring *The Mercy Touch*® to life every day. They are fundamental to who we are and guide how we ensure a respectful, thoughtful, and service-focused approach to all those we encounter. For me, while the delivery of this conduct may vary whether in a leadership capacity or serving my patients directly as a primary care physician, my application of and obligation to the standards do not waver.

Since our founding by the Sisters of Mercy in 1900, we have been an organization that strives to be the best and we set our expectations high. All of us are held accountable for actions and behavior consistent with these standards. Failure to abide by these principles affects Mercy's organizational integrity. Violations could result in disciplinary action, up to and including termination of employment or your relationship with Mercy.

We take pride in compassionately delivering exceptionally high-quality and innovative services. My family has used Mercy for decades. The way in which we deliver these services are fundamental to Mercy because that's what our patients, families and community deserve. It is also what we want for ourselves and our employees.

I am thrilled that you are a part of our team. Thank you for bringing *The Mercy Touch* to life as an essential part of our healing ministry.



Timothy Quinn, MD *President and CEO Mercy Medical Center*

The Mercy Touch®

The Mercy Touch is compassionate people delivering exceptional care.

As caregivers, it's our promise to our patients.



Mercy Medical Center & MercyCare Community Physicans

Our Mission To care for the sick and enhance the health of the communities we serve, guided by

the spirit of the Sisters of Mercy.

Our Vision Working together to provide exceptional health care with The Mercy Touch.

Our Values (ICARE)

The ICARE values define how we perform work and conduct ourselves with each other and our patients. It's how we define and meet the standards of *The Mercy Touch*. The Mercy Touch embodies the values of:

Integrity We adhere to a code of ethics that emphasizes honesty, sincerity and being open through both our words and actions at all times. We strive to always do the right thing

for our patients, families and co-workers.

Compassion We believe everyone at Mercy is a caregiver. We treat all patients and families with

the utmost respect and compassion. We deliver our care and services with kindness

and empathy to help alleviate suffering.

Accountability We accept responsibility for our actions and performance.

Respect We honor and value the individuality, spirituality and diversity of our patients, families

and co-workers by treating them as we – and they – would want to be treated.

ExcellenceWe are committed to being patient-centered and providing responsive and

personalized care to ensure the best possible outcomes in a safe and holistic

environment. We provide superior service and quality by going the extra mile for our

patients, their families and our co-workers.





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Mercy Touch Must-Haves

Throughout the Mercy organization, we are here to serve our customers. Our customers include patients and their families, visitors, co-workers, volunteers and physicians. We are committed to providing exceptional service to meet our customers' needs with the utmost compassion. To ensure Mercy is the best place to work, practice medicine and receive care, all caregivers must exemplify The Mercy Touch Must-Haves, five essential behaviors and actions in the workplace.

- Help people to their destination rather than point or speak directions, walk them when able and/or use visuals when directing to locations off-site.
- Greet people with a smile and "Hello," using their name when possible while simple in nature, it validates for others that we honor and respect everyone's self-worth and dignity.
- Use key words at key times "Is there anything else I can do for you?" Coin your own phrase you want to be remembered for and be genuine in your approach.
 - Foster an attitude of gratitude Never underestimate the power of a thank-you, and dare to be creative (thank-you note, verbal, team recognition, etc.)
- Connect with compassion to meaningfully engage with staff, patients, family and other customers.

First and Lasting Impressions

Build on The Mercy Touch Must-Haves to create positive first and lasting impressions for patients, visitors, and staff.

Greetings and Images

- ✓ Be approachable.
- Acknowledge a person immediately.
- Welcome customers in a friendly manner by smiling warmly, making eye contact and introducing yourself promptly.
- Let patients know why you are there and what you are doing for them.
- Ensure that patients are aware of and understand their written "Rights and Responsibilities" and other pertinent information.
- Use "please" and "thank you" in all conversations when appropriate.
- Treat everyone as an individual; ask patients how they prefer to be addressed.
- ✓ Go above and beyond expectations.

- Be friendly; speak without rudeness, profanity or raising your voice.
- Be responsive; react quickly to a patient's needs (like a call light).
- Treat others as you and they want to be treated.
- Consider all the customers' needs; physically, emotionally and spiritually.
- ▼ Follow the "12-6-Hand Rule":
 - × 12 feet from the guest: Make eye contact
 - × 6 feet from the guest: Greet them
 - Close enough to shake hands: look for clues (puzzled look/body language; ask "How may I help you;" problem solve or thank them)

Impressions (continued)

Alleviate Customer Waiting

- ✓ Look for ways to eliminate wait time.
- Inform patients and families about the estimated wait time.
- Allow for "choice" in waiting if possible (new appointment, library, cafeteria visit, etc.)
- Keep in touch! Communicate progress and expectations. Update patients' family members every hour, at a minimum.
- Explain and apologize for any delays and inconvenience if there is a wait.

- Provide a comfortable atmosphere for waiting customers. Offer refreshments and reading material. Indicate the location of the nearest restrooms or the cafeteria, if necessary.
- Use the service recovery toolkit when appropriate.
- Be aware of noise level and intervene appropriately.

Showing Compassion

- We believe everyone at Mercy is a caregiver. Provide assistance in any way you can.
- Help alleviate suffering.
- Be kind and provide considerate care.
- Value each person; never forget our patients and staff are people.

- Be respectful and show regard for the rights and wishes of all.
- Be inclusive, excluding no one.
- Ask how you can support your co-workers to ensure a positive, supportive work environment.

Impressions (continued)

Personal Appearance

- ✓ Dress according to the appropriate Mercy Appearance Policy.
- Wear identification badges on the front of the body between the neck and elbow. Face/name need to be in view.
- Perfumes or scents may be worn in moderation only outside patient care areas.
- ✓ Use good personal hygiene at all times.

Environmental Appearance

- ✓ Take pride in the building's physical appearance.
- Create a clean, quiet, clutter-free and welcoming environment.
- Keep all hallways free of excess equipment.
- Return equipment to its proper place.

- Pick up litter within the building and dispose of it properly.
- Keep immediate work area neat and clean.
- Take the initiative to submit work orders when needed.

Parking

- Park in designated areas to ensure that our customers have adequate parking.
- Be sure to register your vehicle and affix the Mercy sticker on the passenger-side of the windshield.

Impressions (continued)

Elevator Etiquette

- Pause before entering the elevator so you do not block anyone's exit.
- Be friendly; smile and acknowledge other passengers. Use the elevator as an opportunity to make a favorable impression.
- Be aware of patient confidentiality in the elevator and keep the conversation professional.
- Step aside, or to the back, to make room for others.

- Hold the door for others. Face wheelchair patients toward the door.
- Be sensitive to the patient's need for privacy and comfort when entering an elevator.
- Avoid entering an elevator already occupied by a patient in a bed or a stretcher.
- ✓ Use elevator keys appropriately.

Lasting Impressions

- Go above and beyond expectations.
- ✓ Always follow up and follow through.
- Think LEAN address underlying process problems.
- ✓ Work to solve problems and complaints.
- Say "I'm sorry" if something did not meet the customer's expectations.
- Ask at discharge: "Is there any way we could have improved your stay/visit?"

- Thank the customer for choosing the services of Mercy.
- Assist departing customers, as needed, to the appropriate exit.
- Every customer's request belongs to, and is owned by, each of us. If you are unable to meet a request, be responsible for finding someone who can.

First and Lasting Impressions Q&A

- Q: What should I do if I see someone not following the dress code?
- A: If you are comfortable in addressing it with the co-worker, do so in a respectful manner. "Were you aware that shorts are not allowed under the dress code? You might want to look at the policy again so you don't accidentally violate the policy." If the situation continues, or you are uncomfortable in addressing it with your coworker, share your observations with your supervisor.
- Q: If I am on the elevator and someone is talking about a patient, how do I intervene?
- **A:** Respect confidentiality in all settings. Try to discreetly give a signal. Change the subject. Suggest this conversation be continued in the department.
- Q: I see an employee repeatedly parking in a patient care area.
 Who should I report this to?
- **A:** If you are comfortable in doing so, approach the individual asking if they know where they are to park or inform security or your manager.
- Q: I have a family that is getting very frustrated because a scheduled test is already one hour past the scheduled time. What can I do to help the situation?
- **A:** Offer an explanation, if known. Keep the family as informed as possible. Give choices of alternatives such as rescheduling the appointment. In the hospital they could visit the cafeteria, library or gift shop and be notified when to return to the department via cell phone.
- "There is a little difference in people, but that little difference makes a big difference. The little difference is attitude. The big difference is whether it is positive or negative." W. CLEMONT STONE









Commitments

My Commitment to Providing Patient-Centered Care

We are committed to delivering compassionate care and promoting a healing environment for the patients and families we serve. At Mercy, we care for the whole person: body, mind, and spirit. Exceptional service to our patients, families, and caregivers is a pivotal component of our culture. We value the importance of enhancing the patient experience and delivering *The Mercy Touch* to all those we serve.

My Commitments to Co-Workers

We are committed to being the "Employer of Choice" and to delivering *The Mercy Touch* to staff. As Mercy employees, we are linked to one another by a common purpose: serving our customers and our community with *The Mercy Touch*. Our co-workers, therefore, are our teammates and by helping each other, we help our customers.

Truthfulness

- Be honest and sincere in all interactions with co-workers by letting them know what is expected of them and of you.
- Address inappropriate behavior of a coworker discreetly and in a timely manner. All conflict resolution should be done in private.
- ✓ Strive to always do the right thing.
- ☑ Be open through both words and actions.

Commitments (continued)

Support

- Be tolerant of co-workers by demonstrating courtesy and respect, compassion, consideration and positive feedback, realizing we all have personal shortcomings.
- Be supportive of new employees by offering to help and setting an example of the cooperation expected in the workplace.

Team Member

- Be supportive of team members and team decisions.
- Be an active listener and offer constructive feedback when appropriate.
- Identify problems and work on solutions together.

Trustworthiness

- Ask for what is needed in order to be successful.
- Ask for help when directions are unclear.
- Arrive on time, be prepared and use time at work effectively.

- Offer to go above and beyond for each other in our daily tasks. Recognize coworkers who do so.
- Commit to ongoing learning and timely completion of educational requirements.
- Refrain from harassment, intimidation or violence of any kind. Report any such behavior you witness in the workplace to your supervisor, manager, human resources and/or the Compliance Hotline.
- Balance personal needs with team and organizational goals.
- We honor and value individuality, spirituality and diversity.
- Treat team members as we and they want to be treated.
- Empower staff members by trusting co-workers' judgment and assuming good intentions.
- Hold yourself and co-workers accountable to our service standards.

Respect

- ▼ Treat every co-worker with courtesy, kindness and respect.
- Be considerate of co-workers' privacy. Do not spread personal information, rumors or hurtful gossip.
- Be open-minded and recognize that everyone has an area of expertise.
- ▼ Thank co-workers and show appreciation for support and help.
- Respect the diversity of others including racial, ethnic, gender, religious, age and other differences.

Loyalty

- Take pride in Mercy as if you owned it. This means taking pride in what we do, being responsible for our actions and performance and recognizing our work as a reflection of ourselves.
- Be aware of the services and activities provided by Mercy.
- ✓ Live the values of the organization.
- Be proud of, and advocate on behalf of, your employer.
- Spread confidence in all your interactions, as you are Mercy.







Commitment to My Co-Workers Q&A

- Q: What should I do if I believe others are violating the "Service Excellence Performance Standards"?
- A: All staff are encouraged to give their co-workers the benefit of the doubt and express any concerns to the co-worker first. Help co-workers grow and develop. Ask first for a private conference. Then if needed, ask for assistance from your supervisor on how to best handle the situation.
- Q: I have noticed that a male employee has been very "friendly" with female coworkers in the department. There's a lot of touching, even with patients around. I don't think this is appropriate. What should I do?
- **A:** Mercy has a zero-tolerance policy for harassment in the workplace. Please report your concerns to your supervisor, Human Resources, or the Compliance Hotline.
- Q: I have a problem with one of my co-workers. We share the same assignment in our department, but I feel like I carry most of the load and my co-worker slacks off. I don't want to work with that person anymore. What should I do?
- A: Don't talk to other co-workers talk to the person involved. Ask to speak with the co-worker privately and discuss an equitable sharing of job duties. Involve your supervisor if resolution is not achieved and conflict continues. You should also discuss the issue with your supervisor if you believe the co-worker's behavior may violate our Code of Conduct for example, intentionally violating timekeeping and payroll policies.
- Q: Yesterday I saw a manager yell and scream at an employee in the presence of a patient. This really bothered me and I felt terrible for my fellow employee. Is there anything I can do?
- **A:** Respect is a core value of Mercy. Speak with the manager's supervisor or contact Human Resources regarding your concerns.
- "PRIDE is a personal commitment. It is an attitude which separates excellence from mediocrity." AUTHOR UNKNOWN

Privacy and Confidentiality

Privacy and confidentiality are basic rights of all patients and staff members. Please observe the following guidelines:

- Always knock before entering a room. Close curtains or doors during exams and procedures.
- Information exchanged concerning patients, families and staff members will take place on a "need-to-know basis" in order to fulfill job responsibilities.
- Do not discuss patient information in inappropriate places; e.g. waiting areas, hallways, elevators or the cafeteria, where unauthorized individuals may overhear.
- Do not leave information on computer screens, printers, fax machines or other places where unauthorized individuals may see it. Lock your computer/work station when you step away.
- Do not release information verbally, in writing, over the phone or the computer without appropriate written authorization.

- Respect and protect co-workers' confidentiality as well as that of patients.
- Do not access information in the Electronic Medical Record for personal reasons, including your own information and the information of family members, unless access is necessary to fulfill your job responsibilities.
- Ensure that patient medical records are kept where unauthorized individuals cannot see or access them.
- Be assertive in notifying the appropriate individual(s) when breaches of confidentiality are detected.
- Protect your mercycare.org credentials; never share your Mercy user name and password

Health Insurance Portability and Accountability Act (HIPAA)

The Health Insurance Portability and Accountability Act (HIPAA) Privacy Rule is a federal law that requires healthcare providers and other "covered entities" to protect the privacy and security of patient health information and provides patients certain specific rights related to their health information.

- Be familiar with, and follow, Mercy's policies and procedures in order to protect the privacy and security of health information.
- Stricter guidelines apply to substance abuse, mental health and HIV/AIDS. Confidentiality requirements further direct how protected health information is used and disclosed.
- ✓ Unauthorized access or release of confidential information is illegal.
- Understand the patient's right to access their own healthcare information and Mercy's policy against information blocking, including any practice that is likely to interfere with, prevent, or discourage access, exchange, or use of Electronic Health Information.

If you have questions or need further guidance related to HIPAA please contact:

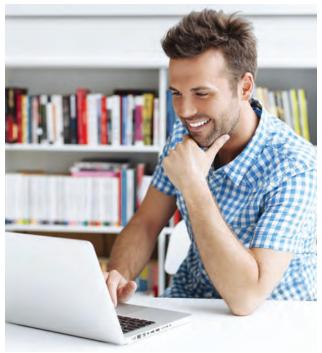
HIPAA Privacy Officer: (319) 398-6846 | HIPAA Security Officer: (319) 221-8892 | privacy@mercycare.org

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Privacy and Confidentiality Q & A

- Q: Our department leaves messages for patients to tell them the best place to park and remind them of the time of their upcoming procedure or appointment. Is that a breach of confidentiality?
- A: Appointment reminders and telephone messages may be used to communicate with a patient, provided limited information is given. The reason for the appointment, name of the procedure or any medical details should not be left on the message. It is preferred to use generic terminology such as "appointment."
- Q: What is the best way to call someone from a reception area to assure you get the right person while protecting their confidentiality?
- **A:** Call people by their last names only (i.e. Mr. Jones). Then, when you are out of hearing distance of others, verify full name, date of birth and reason for the visit.
- Q: A co-worker frequently posts updates on Facebook and sometimes shares about her day at work. Although she never mentions any patient or resident names, she sometimes discusses unusual cases in more detail than I feel comfortable with. Should I be concerned?
- A: Yes. Omitting a patient or resident's name does not make it acceptable to share this type of information on social media. A person can still reasonably be identified without their name being shared, especially when discussing a unique situation which could allow others to identify the patient or resident. Mercy's policies as well as state and federal privacy laws prohibit disclosing protected health information in this way, and can lead to serious penalties including termination of employment and criminal prosecution. You should discuss this matter with your supervisor or contact the Privacy Officer for assistance.
- Q: I work in a role where I have access to patient appointment information through "patient station," in the electronic medical record system (EMR). Recently a friend was admitted to the hospital. I'm concerned and would like to check the EMR to see how she's doing or at least locate which room she's in so I can visit her. Is that okay?
- A: No. Access to the Electronic Medical Record is for work purposes only. Since you are not involved in your friend's care, you do not have any need to access her medical information or location. Only access information in the EMR in performance of job duties and on a need-to-know basis. Please note that Mercy has monitoring systems in place to determine whether users have used their system access appropriately. Discipline for inappropriate access can include termination of employment.







Communication

The goal of communication is understanding. We must be committed to listening attentively in order to fully understand what is being said. Pay close attention to both verbal and nonverbal messages. Ideas and information should be delivered in a clear, concise, accurate, complete, confidential, caring and professional manner.

"Be Engaged" in all Communications

- Give your time and attention. Maintain eye contact as appropriate.
- Listen carefully. Avoid interrupting people unnecessarily.
- Focus on what the customer is telling you to determine what is needed.
- Understand the situation display empathy, compassion and respect.

- Be professional be sure your verbal and non-verbal communications match.
- Recognize and be sure that cultural, ethnic, generational, religious and special needs are understood and met.

Access and Flow of Information and Education

- Follow through on all requests and promises in a timely manner.
- Keep in touch! Provide anticipated timelines for procedures, ongoing information, plan of care, progress reports and what to expect.
- Share information between co-workers and departments in a timely manner.
- Use easily-understood and appropriate language when providing information and education.
- Reinforce verbal education with written material when possible.

- Consider an interdisciplinary approach when providing patients and families with information and education.
- Partner with patients and families to understand and deliver the information and education they desire.
- Request feedback on information provided to ensure understanding.
- Ensure that special needs of customers are met (approved translators for non-English speaking patients and signing interpreters, amplification devices, closed-captioned TV for the hearing impaired, etc.).

Communication (continued)

Telephone Communication Etiquette

- Know how to operate the telephones in your department.
- Answer phones within three rings if possible.
- Answer calls politely, slowly and clearly with a smile in your voice.
- Return calls promptly.
- Answer all calls by identifying your organization's name (Mercy Medical Center, Mercycare Community Physicians, etc. for external calls), your department and yourself.
- External call: "Good (time of day), Mercy (department name), this is (your name), how may I help you?
- Refrain from eating, drinking or chewing gum when answering a phone.
- ✓ If necessary, ask permission to transfer or put on hold.
- Provide the caller with the correct number before transferring a call in case the call is lost. Listen to what the caller is saying and make sure you transfer the caller to the correct location. Provide receiver of the call with the name of the customer and the nature of the call.
- ✓ Obtain the caller's permission before putting the caller on hold.
- Thank the caller for holding. Acknowledge the caller on hold periodically and ask if the caller wishes to continue to hold.
- Keep personal calls to an absolute minimum, preferably during breaks or lunch.
- Personal and business cellular phones should be in silent mode in all meetings and wherever possible.
- All employees are responsible to respond to patient call lights. Requests should be addressed within 5 minutes.
- Use patient room white boards according to established standards to enhance communication.
- Thank the caller for calling.

Email Communication Etiquette

Please use email responsibly. All messages distributed via the company's email system, even personal emails, are Mercy's property. All email in the system is subject to Mercy's right to monitor, access, read, delete, copy, disclose and use such email without prior notice to the originators or recipients. Email may be monitored and read by authorized personnel for Mercy for any violations of law, breaches of Mercy policies, communications harmful to Mercy or for any other reason.

- All employees are responsible for keeping their mailbox current.
- It is expected that the recipient will react appropriately based on the subject line and the related requests.
- Use of consistent subject lines to identify the type of message is expected. They are as follows:
 - FYI "For Your Information" read at your convenience
 - * ACTION REQUIRED Requires an action on the part of the recipient. Could be timesensitive as well. Place a deadline in the subject line.
- ▼ Typical use of "cc" implies an FYI only. Please keep cc'd recipients to a minimum.
- Email messages should be concise and limited to one page. The most important part of the message should be included in the first few sentences.
- All meeting requests must be in the form of a Calendar Meeting Request and must contain a stated purpose or an agenda.

- Prior to sending an email message, please consider if it is the most appropriate means of communication.
- Internally, always use your "Out of Office Assistant" to send automatic replies to other Mercy senders when away from work for a day or longer. Include a message which informs the sender who they may contact in your absence if necessary.
- Employees are encouraged to include a signature containing contact information in their email.
- Users must encrypt any email messages that include Protected Health Information (PHI) which will be sent to anyone outside of Mercy. Contact Information Services for encryption process.
- Any email message containing PHI/patient information should be marked Confidential.
- Use caution when opening attachments or clicking links in emails you were not expecting. Look for red flags that indicate the email may be malicious.
- Contact the IS Service Desk at 861-7777 immediately if you receive an email you believe is suspicious.

Communication (continued)

Social Media Etiquette

Personal social networking is limited during work hours to ensure employees maintain their focus on patients, safety and work-related responsibilities. You are encouraged to follow Mercy or MercyCare from a personal computer or smartphone on social networking sites (Facebook, Twitter, YouTube, Pinterest) – it is a great way to get updates and announcements about Mercy.

- Visiting social media sites is allowed during designated breaks or personal time at home, etc. using personal devices.
- Unless specifically instructed, employees are not authorized and therefore are prohibited from speaking on behalf of Mercy.
- You may not publicly discuss patients or the services provided to them outside company-authorized communications.
- ☑ In all cases, do not publish any information regarding a patient. HIPAA regulations must be adhered to at all times.
- Recognize that you are legally liable for anything you write or present online.
- You can be disciplined by Mercy for commentary, content or images that are defamatory, pornographic, proprietary, harassing or that can create a hostile work environment.
- ✓ Honor the privacy of your co-workers.
- Mercy encourages individuals to write knowledgeably, accurately and use appropriate professionalism. Remember, you represent Mercy even outside of work.

Communication Q&A

- Q: How can I quickly secure the information on my computer when I am called away?
- A: By using the key strokes of Ctrl, Alt and Delete, a window will open presenting an option to "lock computer." Press the Enter button to lock the computer. You can also quickly lock the computer by simultaneously pressing the Windows key and the "L" on your keyboard. You will be prompted for your password to log back onto the computer.
- Q: What can I do to ensure that patient concerns and needs are being communicated when English is not their primary language?
- **A:** The Mercy organization provides language interpreting services to any individual free of charge. Refer to the colored reference card at the beginning of the blue phone directory on how to access this service in a timely manner or access the information on the Mercy Portal.
- Q: Is there an alternative to placing someone on hold or transferring a call multiple times?
- A: Taking the person's name, number and message and delivering it to the appropriate person is an option. If you do transfer a call, tell the individual you are going to transfer and who you are transferring them to. Also, offer a phone number in case they need it in the future. Stay on the line and introduce the caller if possible.
- Q: Co-workers are laughing and having a personal discussion in close proximity to a patient who can hear them. What can I do?
- A: Always be mindful of your environment and help others to do the same.

 Use a statement like, "I need your assistance in helping create a quiet environment." When in close proximity to patients and families, such as open nurses' station, elevators and hallways, demonstrate "on-stage" behavior.

 Private break areas and report rooms are examples of "off-stage."



Awareness

Safety Awareness

Safety is the responsibility of all staff members to ensure a safe environment, free from harm.

Patient/Employee Safety

- Be aware of and follow all of the National Patient Safety Goals.
- Report all safety concerns promptly and completely to your supervisor or Mercy Security.

- Be prepared for emergencies and know the correct and prompt actions to take. Red binders are available in all departments detailing actions in case of an emergency.
- ✓ Know proper fire procedure:

RACE (R – rescue; A–alarm; C–contain; E–extinguish)

- Know fire hazard evacuation routes.
- Prevent slips, trips and falls.
- Be aware of potential chemical hazards. It is your right to know. Review Material Safety Data Sheets (MSDS) information.
- Protect your back when lifting, pushing, pulling or carrying. Obtain help if necessary.
- Use protective clothing and equipment when appropriate.
- ✓ Participate in all safety drills.

Environment safety

- Correct all safety hazards if possible or report to the appropriate department.
- Respect all equipment. Make sure it is in good working order and use it in the proper manner.
- Be aware of electrical cord placement.
- Keep all hallways free of excess equipment.

- Return equipment to its proper place.
- ✓ If in doubt, ASK!
- Respect the environment with appropriate handling of hazardous and infectious waste.
- Contact the Safety Officer immediately for all serious safety concerns.

Safety Awareness Q&A

- Q: An employee is not washing hands. What do I do?
- **A:** Talk to that employee or speak to the employee's supervisor. All employees should incorporate the hand-washing procedure as they enter and exit patient rooms, exam rooms and public bathrooms.
- Q: There is a spill of an unknown substance in the hallway. What do I do?
- A: Think about the immediate safety concerns and place safety signs. If you can determine the substance, clean it up to your level of expertise and/or call for assistance. Maintain safety precautions until help arrives.
- Q: How do I know if I have the right protective equipment to do my job?
- **A:** Talk with your supervisor and ask to see the Material Safety Data Sheets (MSDS) for chemicals that you are unfamiliar with.
- Q: What is horizontal evacuation?
- A: Horizontal evacuation is used during a fire emergency. If you have to leave your work area because of visible smoke, flame or charring, you would move to an adjacent smoke compartment (separated by fire doors).
- Q: If I come upon a safety issue such as an overloaded electrical outlet, what should I do?
- **A:** If you are able to address it, do so immediately. Otherwise, work with your supervisor on a safe option.
- "By collaborating with others in works of Mercy, we continually learn from them how to be more merciful."

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Ethics, Standards and Concerns

Ethics Committee

The purpose of the Ethics Committee is to provide guidance in the conduct of business and the provision of care and services in accordance with the Ethical and Religious Directives for Catholic Healthcare Services and to assure adherence to the mission and values of Mercy. Functions of the committee include:

- Facilitate and provide education regarding ethical issues for physicians, hospital staff and the general public;
- ✓ Develop and periodically review/revise policies related to ethical issues; and
- Provide consultation to patients, families, physicians and staff regarding ethical issues that arise in the provision of care.

The committee meets six times a year and reports to the Board of Trustees. Membership on the committee is interdisciplinary and includes Board members and members of the medical staff, pastoral care, nursing, social work and administration.

Policies Pertaining to Ethical Concerns

- ✓ Advance Directives
- ✓ Brain Death Determination*
- ✓ Organ and Tissue Donation*
- ✓ Organ Donation after Cardiac Death*

- Rights and Responsibilities, Patient/Resident
- ✓ Withholding or Withdrawing of Life-Sustaining Procedures*

*Mercy Medical Center policies

Professional Ethical Standards

All Mercy professional staff members follow the unique code of ethics pertaining to their profession. These individual codes define accepted/acceptable clinical behaviors, promote high standards of practice and establish a framework for professional responsibilities. All professional codes of ethics are meant to enhance the code of conduct that applies to all Mercy employees and medical staff in their interactions with patients, families and other staff members.

Mercy supports professional codes of ethics insofar as they help create an environment in which ethical behavior is the norm. A code of ethics also provides a benchmark to use for self-evaluation in maintaining professional standards.



Organizational Integrity

Corporate Compliance Program

Acting with integrity, one of Mercy's key values, and making decisions based on the highest standards of ethical behavior are critical to respecting our sponsorship by the Sisters of Mercy and maintaining the trust of the community we serve.

Mercy is committed to carrying out its healthcare ministry in a manner consistent with a high standard of individual, organizational, ethical and legal business practices. In order to ensure that appropriate ethical and legal business standards and practices are maintained and enforced, we have established a corporate responsibility program for the operation of Mercy and all of its subsidiary corporations. This program focuses on:

- Business and professional standards of conduct;
- Compliance with federal, state and local laws and regulations;
- ✓ Compliance with standards of accrediting organizations;
- Promotion of good corporate and community citizenship;
- Prevention and early detection of misconduct; and
- Identification and education relating to areas of particular concern.

As a condition of employment, Mercy requires all employees to abide by its Code of Conduct and other policies and to report all suspected instances of fraud, unethical conduct or other non-compliance with federal, state, local laws, regulations or Mercy policies and procedures.

These same requirements apply to contract employees, volunteers, medical staff members and Board members. Individuals will be held accountable for actions and behaviors inconsistent with those outlined in our policies, Code of Conduct and Corporate Compliance Program. Violations could result in corrective action(s), up to and including termination of employment, suspension of medical staff privileges or termination of a business relationship, as applicable in accordance with Mercy's policies.

Additionally, Mercy's policies strictly prohibit retaliation of any form against an employee or other individual who, in good faith, reports suspected instances of non-compliance, unethical conduct and concerns or is otherwise involved in an investigation.

The following areas are key pieces of our Compliance Program established to ensure our organizational integrity:

Antidiscrimination

Mercy is committed to creating and maintaining a respectful environment for all, including employees, caregivers, physicians, patients and visitors. Therefore, you should expect to be treated with respect as well as to act with respect to all. Discrimination against patients, residents, employees, medical staff, business associates and others is prohibited.

- No form of discrimination or harassment on the basis of race, color, religion, sex (including pregnancy, sexual orientation or gender identity) national origin, age, disability and genetic information or any other protected classwill be tolerated.
- Allegations of discrimination will be promptly and thoroughly investigated.
- Any person found to have violated the discrimination or harassment policy is subject to corrective action, up to and including immediate discharge.

False Claims Act (FCA)

The Federal Civil False Claims Act (FCA) (31 U.S.C. §§ 3729-3733) and the lowa False Claims Act (Iowa Code Chapter 685) impose civil liability on any person or entity who knowingly creates false or fraudulent claims, thereby submitting a false record or statement, in order to receive or conspire to receive payment from a federally-funded healthcare program like Medicare, Medicaid or Hawk-I. In health care, this includes things like submitting bills for services never performed, double-billing for services and billing separately for services that should be a single service. Under the FCA, "knowingly" means having actual knowledge that the information on the claim is false, acting in deliberate ignorance of whether the information is true or false, or acting with reckless disregard of whether the information is true or false. Mercy expects all employees, contractors, agents, volunteers, medical staff members and Board members to act with honesty and integrity at all times. Further, it is everyone's responsibility to ensure compliance by reporting issues and concerns to your supervisor and/or the Mercy Compliance Hotline.

Part of FCA law outlines the whistleblower protections: any person has the right to report fraud, waste, and abuse without fear of retaliation. Please refer to your employee handbook for more information outlining these rights.

Organizational Integrity (continued)

Billing Health Programs

Healthcare organizations, including Mercy, are subject to numerous laws and regulations that impact the delivery of healthcare services. In addition, federal and state governments are responsible for the payment of significant portions of the healthcare services we provide to patients covered by the Medicare and Medicaid programs. Many laws and regulations are complex and challenging to apply in our rapidly changing industry. Nevertheless, Mercy is committed to fully complying with all laws and regulations. Therefore, it is imperative that we follow all the requirements of the government (e.g. Medicaid and Medicare) and third-party payers (such as commercial insurance) in our documentation, coding and billing practices. Please refer to the "Billing Health Programs Policy" for further guidance.

Fraud, Waste and Abuse

It is the responsibility of every employee, contractor, agent, volunteer, medical staff member or Board member of Mercy to act with honesty and integrity and to assist with preventing fraud and abuse in all of our processes. Mercy expects you to follow all applicable laws, regulations and requirements of the government and other third-party payers, as well as Mercy's policies. In order to maintain

our culture and our organizational integrity, we all need to be aware of and report items of concern so that they may be investigated and appropriately addressed.

The Mercy hotline for reporting concerns is (319) 369-4586. The HHS OIG hotline phone number is (800) HHS-TIPS.

Tax-Exempt Status

Mercy Medical Center is a not-for-profit, tax-exempt organization operating exclusively for religious and charitable purposes. Care of the poor, health promotion and medical education are examples of activities that support our charitable purpose.

Our tax-exempt status requires us to follow a number of additional laws and regulations. The laws generally prohibit the following:

- Paying more than "fair market value" for goods and services;
- Providing goods or services to others at less than fair market value, unless specifically allowed by federal or state law;
- Improper use of the organization's assets for the benefit of Board members, officers, senior executives and others in a position of substantial influence over the business activities of the organization;

- Engagement of tax-exempt organizations in substantial lobbying activities; and
- Direct or indirect campaigning for or against the election of any candidate for public office, including the donation of organizational funds to any political campaign.

Record Retention

Each of us is responsible for assisting with maintaining accurate and complete records.

Follow all document retention requirements, including those of government (e.g. Medicare and Medicaid) and other third-party payers, such as insurance companies, who pay for healthcare services we provide. These requirements generally include maintaining complete and accurate medical records. Proper record retention is a requirement. Please refer to the record retention policy for guidelines.

Conflict of Interest

A conflict of interest exists whenever outside activities or relationships influence, or would appear to influence, your decision-making. In relationships with vendors, other business partners, competitors' employees and other individuals working on behalf of Mercy, you have a duty to act in the best interest of the organization. This means avoiding situations where relationships with vendors or other business partners could influence decisions you make involving Mercy. Please refer to the Conflict of Interest Policy for more information.

Non-Retaliation Policy

Ultimately, it is your responsibility to report issues and concerns. We understand that you may not wish to report concerns if you feel you may be subjected to retaliation or harassment. Mercy's policy strictly prohibits retaliation, in any form, against an individual reporting an issue or concern in good faith. This means that anyone who reports a suspected violation of law or regulation or other compliance concern, may not be fired, pressured to resign, or otherwise retaliated against for reporting. Retaliation is subject to discipline, up to and including dismissal from employment, suspension of medical staff privileges or termination of business relationships, as applicable, in accordance with Mercy's policies.

Compliance Oversight

Mercy's Compliance Program and related policies are located on the Mercy Portal under Policies and Procedures or via a quick link on the Compliance webpage on the Portal. All Mercy Board members, employees, physicians, volunteers and contract workers should read and abide by these policies.

Key MSC Compliance Personnel

Corporate Compliance Officer: (319) 861-7994

Senior Legal Counsel: (319) 369-4544

Legal Counsel: (319) 369-4740

Organizational Integrity (continued)

HIPAA Contacts

Privacy Officer: (319) 398-6846 Security Officer: (319) 221-8892

privacy@mercycare.org

Committees

A Compliance Operations Committee meets regularly to ensure continuous organizational focus on compliance activities. The committee consists of key MSC personnel, including: Administration, the HIPAA Privacy Officer, HIPAA Security Officer, Compliance Officer and personnel from key operational departments from across the organization. The committee focuses on various compliance areas, hot topics and concerns, including the creation of an annual work plan and monitoring its completion and the prevention of fraud, waste and abuse.

A Corporate Compliance Committee comprised of MSC Board members and Administration meets regularly to provide oversight to the compliance program.

Education and Training

Programs established to enforce Service Excellence Performance Standards are:

Web in-service module on compliance/business integrity topics, new employee orientation, called "Discovering Mercy," annual in-person compliance "refresher" training, and other educational

programs, as needed, throughout the year. Additionally, information on Compliance topics and external resource links can be located on the Compliance Integrity Portal.

Compliance Hotline

To assist with maintaining our ethical culture and standards of conduct, including the prevention of fraud, waste and abuse, Mercy has established a hotline for reporting concerns. Concerns should be reported to your supervisor or next-level manager, administration, etc. If you are uncomfortable reporting the issue in that manner, or it remains an issue/concern after your discussion, please report the situation using the hotline. which is available 24 hours/day via either telephone or online through the Portal. The telephone hotline is an automated, independent, untraceable telephone system which allows reporters to remain anonymous. The hotline number is (319) 369-4586. The online hotline is available through a link on the Compliance Team site on the Portal (https://mercycr.sharepoint.com/ Sites/compliance). Concerns/reports may also be sent via inter-office mail or U.S. Mail to the attention of the Mercy Corporate Compliance Officer, Senior Legal Counsel, or Legal Counsel at Mercy Medical Center, 701 10th St. SE, Cedar Rapids, IA 52403. Please provide detailed information on the issue/concern to assist us with our investigation. All reported concerns are thoroughly investigated and appropriately addressed.

Compliance Hotline (319) 369-4586

Compliance Q&A

- Q: A tip or gift was offered to me after I helped a patient. What do I do?
- **A:** Explain to the patient that you were happy to provide the service and you are unable to accept tips or gifts. If that person persists or would become offended by the refusal of the tip, ask them to give it to the Mercy Foundation.
- Q: I'm afraid I will lose my job if I tell someone about a situation in my department. How can I be sure that the Compliance Program will protect me?
- A: Mercy has a very strong policy against retaliation of any kind. Additionally, there are laws prohibiting retaliation for good faith reporting of concerns. The Compliance program enforces these policies and laws and will not tolerate any violations from any level. If you feel more comfortable, the hotline reporting mechanism has numerous anonymous reporting methods to use in reporting the concern. It is your duty as an employee to report any concerns so that we can continue the mission of Mercy.
- Q: I made a mistake or violated policy and want to correct the error but I am afraid of losing my job if I self-report the error. What should I do?
- A: Report your concern to your manager and review the policy together or call the hotline at (319) 369-4586. While self-reporting does not mean that you will be exempt from all consequences, it is generally true that a prompt and forthright disclosure will be considered a positive action.
- Q: If I have shared a concern and don't feel anything has been done, what do I do?
- **A:** Go to your supervisor. If you still don't feel your concern has been resolved, call a member of the compliance team or the hotline.
- "We are what we repeatedly do.

 Excellence, then, is not an act but a habit." ARISTOTLE









