



Title: Corporate Compliance and Ethics Program

Scope:

Trauma Trust’s Corporate Compliance and Ethics Program covers areas of healthcare operations as well as areas of criminal and significant civil liability, such as antitrust, tax-exempt status, financial arrangements with physicians, employment, and intellectual property. Trauma Trust assesses annually areas of significant environmental risk, addresses other significant areas of criminal and civil liability, and addresses ethical business behaviors. The Corporate Compliance and Ethics Program will be continually updated to meet the needs of the organization, address new areas of risk, and allow for a gradual, thoughtful, and well-planned development process.

Policy Statement:

A Corporate Compliance and Ethics Program is a coordinated effort to establish an environment that promotes self-monitoring, detection, and resolution of problems, while reaffirming key organizational themes of honesty, quality, and superior service.

Rationale for Development of a Corporate Compliance and Ethics Program:

Trauma Trust holds to high standards of ethical business practices, In addition to communicating its strong belief in adhering to ethical business practices, the federal government, through the Office of Inspector General (OIG) has recommended that healthcare organizations adopt corporate compliance programs. In February 1998 the OIG published its *Compliance Program Guidance for Hospitals*. Within that publication and subsequent other program guidance’s, the OIG indicated that it will “consider the existence of an *effective* compliance program that pre-dated any Governmental investigation when addressing the appropriateness of administrative penalties.” Therefore, in addition to evidencing sound ethical business practices, Trauma Trust is desirous of adhering to OIG recommendations regarding the implementation and development of an *effective* corporate compliance program. Accordingly, the Trauma Trust Corporate Compliance Program is tailored after and includes the elements indentified by the OIG and the United States Sentencing Commission.

Description of Elements of Trauma Trust Corporate Compliance and Ethics Program:

I. Development and distribution of written standards:

A. MultiCare Standards of Business Conduct. MultiCare developed a

written document entitled *Standard of Business Conduct*. This handbook is a means for communicating our joint philosophy of business ethics and compliance. The handbook serves as an easily understood and public representation of our joint approach towards corporate compliance and business ethics. Accordingly, it is a primary communication tool on these subjects. In addition, the handbook is used for training on the corporate compliance and ethics program and also serves as a method for communicating to new employees, and medical staffs the importance of this topic. MultiCare will periodically update the publication.

- B. Policies and Procedures: Policies and procedures will be developed to document and communicate Trauma Trust's methods for managing various compliance and ethical standards.

Trauma Trust will take reasonable steps to communicate its standards and procedures.

II. Corporate Compliance Officer:

The Trauma Medical Director will serve as the Corporate Compliance Officer. Specific responsibilities for the management of the Corporate Compliance Program may be delegated. Responsibilities include:

1. The development, review, and updating of the Corporate Compliance Program.
2. The development and distribution of compliance standards including the assignment of policies for development and revision.
3. The review, development and participation in the Corporate Compliance and Ethics Program training. Corporate compliance training will be incorporated into the annual training update.
4. Receipt of corporate compliance concerns and assignment of them to an investigation team. The Trauma Medical Director will monitor investigations and review findings to determine necessary action required after the completion of investigations. Consultations with external consultants and/or facility management teams will be completed as appropriate to determine necessary action.
5. The Trauma Medical Director will report to the Trauma Trust Board of Directors the activities and outcomes of the Corporate Compliance and Ethics Program on at least an annual basis.

III. Corporate Compliance and Ethics Education and Training Program:

The new employee orientation program will be modified to include appropriate corporate compliance and ethics education. Annual review and updates of the corporate compliance and ethics program will be completed by all employees.

IV. Process to Receive Concerns:

Trauma Trust has adopted the MultiCare process for providing opportunities for individuals to express concerns around matters of corporate compliance. The

process is outlined in the MHS *Standards of Business Conduct*. The steps for the reporting process are:

1. Discussion with immediate supervisor;
2. Discussion with Trauma Medical Director;
3. Discussion with other resources available within Franciscan Health System or MultiCare Health System such as Human Resources, Legal Services, and the facility Corporate Compliance Officer.

V. Evaluation and Monitoring:

A periodic review of the Corporate Compliance and Ethics program will be undertaken to identify areas of risk and identify specific areas of concern.

VI. Investigations and Remediations

In the event of a violation of the Corporate Compliance and Ethics Program, the Trauma Medical Director has the responsibility for developing modifications in policies, procedures and protocols to mitigate the possibility of a recurrence. If the violation resulted in a violation of law, the Trauma Medical Director will immediately consult with Franciscan Health System and MultiCare Health System Senior Management, if appropriate, General Counsel, and external legal counsel in any reporting and resolution of the matter with the appropriate governmental agency.

VII. Incentives and Enforcement

Trauma Trust shall promote and enforce the Compliance and Ethics program through appropriate incentives to perform in accordance with the program and through appropriate disciplinary measures for engaging in non-compliant conduct or for failing to take reasonable steps to prevent or detect non-compliant conduct.

After non-compliant conduct has been detected, Trauma Trust will take reasonable steps to respond appropriately to the non-compliant conduct and to prevent further similar conduct, including making any necessary modifications to the Compliance and Ethics program.

Related Policies: Gifts, Gratuities, and Business Courtesies

Related Forms: MHS Standards of Business Conduct

Point of Contact:

Approval By:

Trauma Medical Director

Trauma Leadership Committee

Original Date:

Revision Dates:

Reviewed with no Changes Dates:

Date of Approval:

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