



Allegheny General Hospital



Allegheny General Hospital –
Suburban Campus



Alle-Kiski Medical Center



Canonsburg General Hospital



The Western Pennsylvania Hospital



The Western Pennsylvania Hospital –
Forbes Regional Campus

The System Compliance and Integrity Program



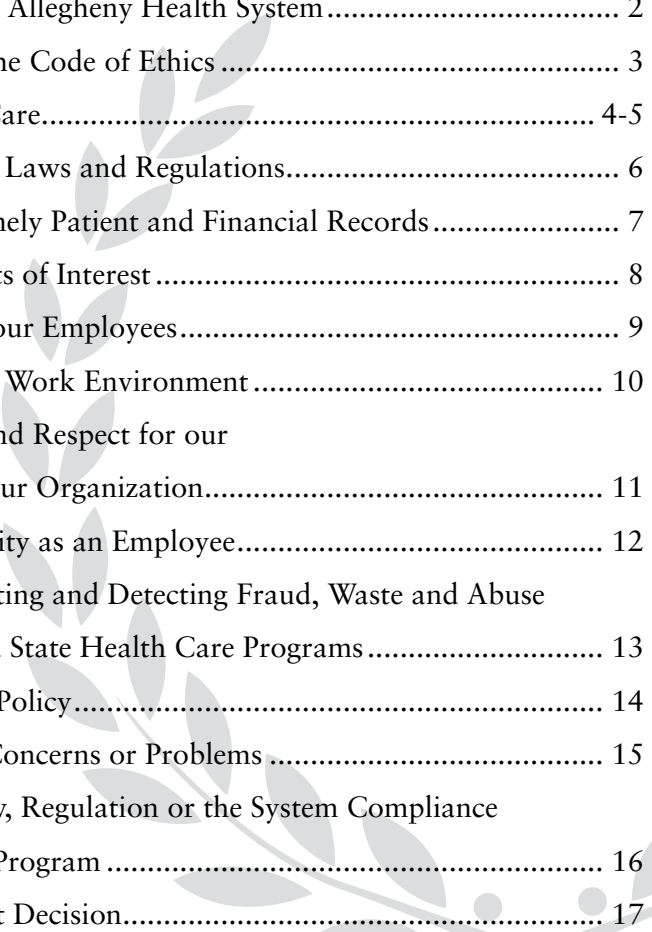
Code of Ethics

Revised: November 20, 2008

**West Penn Allegheny
Health System**

TABLE OF CONTENTS

Message from the President.....	1
About West Penn Allegheny Health System.....	2
Introduction to the Code of Ethics	3
Quality Patient Care.....	4-5
Compliance with Laws and Regulations.....	6
Accurate and Timely Patient and Financial Records	7
Avoiding Conflicts of Interest	8
Commitment to our Employees.....	9
Safe and Healthy Work Environment	10
Confidentiality and Respect for our Patients and our Organization.....	11
Your Responsibility as an Employee.....	12
Policy for Preventing and Detecting Fraud, Waste and Abuse in Federal and State Health Care Programs.....	13
Non-Retaliation Policy.....	14
How to Report Concerns or Problems	15
Violations of Law, Regulation or the System Compliance and Integrity Program	16
Making the Right Decision.....	17



Dear Employee,

This guide has been developed to provide you with an overview of The System Compliance and Integrity Program and the Code of Ethics of West Penn Allegheny Health System. It is the goal of West Penn Allegheny Health System to act at all times with the highest ethical standards and integrity.

Both The System Compliance and Integrity Program and the Code of Ethics are founded on our System's vision and values. The values represented within this guide are goals that we, as an organization, strive to achieve on an ongoing basis. The organizational policies and procedures we have developed provide everyone within West Penn Allegheny Health System with a clear understanding of the professional, legal and personal expectations of us in the workplace.

Each of us has the responsibility to read The System Compliance and Integrity Program Code of Ethics guide carefully and completely. Please take time to familiarize yourself with this information and consider its content when completing your daily activities.

If at any time you are unclear about an aspect of The System Compliance and Integrity Program or the Code of Ethics of West Penn Allegheny Health System, please speak with your supervisor or your individual organization's Compliance Liaison Officer, or call the Compliance Line phone number which is explained in this guide.

Sincerely,

A handwritten signature in black ink, appearing to read 'C. T. Olivia', with a long horizontal flourish extending to the right.

Christopher T. Olivia, M.D.
President and Chief Executive Officer

ABOUT WEST PENN ALLEGHENY HEALTH SYSTEM

West Penn Allegheny Health System (WPAHS) features some of the oldest and best-known names in health care in western Pennsylvania. From their inception, the System's hospitals have been in the vanguard of patient care, medical research and health sciences education.

Comprised of two tertiary and four community hospitals, WPAHS includes Allegheny General Hospital and The Western Pennsylvania Hospital, both in Pittsburgh; Alle-Kiski Medical Center in Natrona Heights; Canonsburg General Hospital in Canonsburg; The Western Pennsylvania Hospital-Forbes Regional Campus in Monroeville; and Allegheny General Hospital-Suburban Campus in Bellevue. Offering a comprehensive range of medical and surgical services, the hospitals serve Pittsburgh and the surrounding five-state area, house nearly 2,000 beds and employ more than 13,000 people. Together, the WPAHS hospitals admit nearly 79,000 patients, log over 200,000 emergency visits and deliver more than 4,000 newborns each year. Combined, the hospitals are among the leaders in percentages of total surgeries, cardiac surgeries, neurosurgeries and cardiac catheterization procedures performed throughout the region.

The System Compliance and Integrity Program Code of Ethics of West Penn Allegheny Health System applies to all System and individual institution governing body members, officers, managers, employees, physicians, and, where appropriate, contractors and other agents.

The institutions that comprise West Penn Allegheny Health System include:

Allegheny General Hospital	Friendship Insurance Company, Inc.
Allegheny General Hospital – Suburban Campus	Suburban Health Foundation
Allegheny Medical Practice Network	The Western Pennsylvania Hospital
Allegheny Singer Research Institute	The Western Pennsylvania Hospital – Forbes Regional Campus
Allegheny Specialty Practice Network	The Western Pennsylvania Hospital Foundation
Alle-Kiski Medical Center	West Penn Allegheny Foundation, LLC
Alle-Kiski Medical Center Trust	West Penn Allegheny Oncology Network
Canonsburg Ambulance Service	West Penn Physician Practice Network
Canonsburg General Hospital	
Forbes Health Foundation	

INTRODUCTION TO THE CODE OF ETHICS

The following pages contain West Penn Allegheny Health System's Code of Ethics. The Code contains the ethical principles to which WPAHS is committed and has been divided into seven sections:

- *We provide quality patient care;*
- *We comply with laws and regulations;*
- *We keep accurate and timely patient and financial records;*
- *We avoid conflicts of interest;*
- *We have a commitment to our employees;*
- *We maintain a safe and healthy work environment; and,*
- *We protect confidentiality and respect our patients and our organization.*

Some of the principles listed on the following pages are general statements to which a previously adopted policy applies. Detailed policies, outlined in each institution's Policy Manuals, will continue to provide you with specific guidance related to the principles described in this Code. Nothing contained in this document is intended to lessen the importance of complying with those policies and procedures. Rather, the Code and the organizational policies and procedures are intended to function together, with the Code serving as a resource to guide us in handling situations which we may encounter in our daily activities.

If you have any questions regarding the Code of Ethics, feel free to discuss those questions with your supervisor or individual organization Compliance Liaison Officer, or call the Compliance Line phone number that is discussed later in this booklet.

CODE OF ETHICS

WE PROVIDE QUALITY PATIENT CARE

- We will provide quality patient care with professionalism and integrity, striving to achieve beneficial outcomes for our patients at the lowest possible cost.
- We will expect that patient services are planned, coordinated, provided, delegated and supervised by professional health-care providers who assess and recognize the unique physical, emotional and spiritual needs of every patient.
- We will treat our patients based solely on clinical needs, regardless of how the organization is compensated or shares financial risk.
- We will provide patient care that includes not only the recognition and treatment of disease and health, but also patient education and patient advocacy.
- We will adhere to all applicable patient care standards and guidelines.
- We will expect physicians to comply with the Patient Safety plan and report serious events to the Risk Management Department. If a hospital learns that a physician did not report a serious event, the hospital will notify the licensing board of the failure to report.
- We encourage licensed and certified employees to abide by the ethical standards set forth by their professional organizations.
- We will provide emergency medical treatment to all patients, regardless of their ability to pay, by examining presenting patients to determine whether an emergency exists and by stabilizing emergency medical conditions.
- We will demonstrate compassionate care that safeguards each patient's personal dignity and respects his or her cultural and spiritual values.
- We will encourage a patient's right to access protective services such as guardianship, advocacy services and child or protective services when circumstances apply.

CODE OF ETHICS

WE PROVIDE QUALITY PATIENT CARE

continued from page 4

- We will respect and support each patient's right to competent, considerate and courteous treatment or service within our capacity without discrimination as to race, color, age, religion, creed, gender, sexual orientation, national origin, veteran or military status, disability or source of payment.
- We encourage patients to participate in treatment decisions, to be fully informed by their physicians, and to openly communicate with caregivers. We will provide patients with accurate and timely information regarding their health, diagnoses, prognosis and other necessary information.
- We will protect and respect patients and their rights during research, investigation and clinical trials by having physicians provide them with information to make informed decisions, describing the expected benefits, potential discomforts and risks, and describing the alternatives that might also help them. Patients should be informed that they may refuse to participate without compromising their access to the services of West Penn Allegheny Health System.
- We will use a Charity Care policy and offer financial counseling to assist uninsured and underinsured patients in receiving medically necessary services.
- We will address patient questions and/or complaints and work to resolve all conflicts.
- We will employ only personnel with proper credentials, experience and expertise in meeting the needs of our patients. We will allow only properly licensed and, where applicable, credentialed personnel to perform clinical assessments and procedures.

CODE OF ETHICS

WE COMPLY WITH LAWS AND REGULATIONS

- We will strictly comply with all federal, state and local laws and regulations, and internal organizational policies.
- We will not misrepresent facts or falsify financial, clinical or employee records.
- We will maintain all financial, clinical and employee records in accordance with legal requirements and make records available for inspection only by authorized individuals.
- We will abide by all applicable antitrust and similar laws that regulate competition.
- We will not contribute any of West Penn Allegheny Health System's money or property to any organization, political candidate, party, committee or individual, which would violate any applicable law. However, we may personally participate in and contribute to political organizations or campaigns as private individuals.
- We will not duplicate copyrighted materials in any form, including electronic software, without written permission of the license holder.
- We will comply with all applicable tax laws, engage in legal and ethical activities to further our charitable purpose and ensure that our resources are used to further the public good.
- We will not express our personal views on behalf of West Penn Allegheny Health System or represent the organization in any way, unless appointed by Administration to do so.
- We will consult with our supervisor if there is any question or concern whether information or documents requested by a government official are subject to disclosure.
- We will notify internal Legal Services immediately upon receiving a subpoena or other legal process related to billing, patient records or other System business.

CODE OF ETHICS

WE KEEP ACCURATE AND TIMELY PATIENT AND FINANCIAL RECORDS

- We will prepare and maintain all patient records, documents, reports and bills accurately and completely. Only appropriate procedure, diagnosis and billing codes will be used, while taking necessary steps to verify the accuracy of the information, so that services are actually performed and appropriately documented before bills or claims are submitted for payment.
- We will not knowingly submit claims for payment or reimbursement of any kind that are false, fraudulent, inaccurate, incomplete or fictitious. We are obligated to notify West Penn Allegheny Health System's Compliance Line if we are aware or suspicious of any billing and coding practices that may deviate from this policy.
- We will make full, fair, accurate, timely and understandable disclosures in all reports, and documents filed with, or submitted to creditors, bond holders or other financial institutions, and in other public communications.

WE AVOID CONFLICTS OF INTEREST

- We will disclose any actual or potential conflict of interests in personal and professional relationships, and will not participate in any decisions where such a conflict exists.
- The Board of Trustees, management and other key personnel who interact with outside organizations and businesses will complete a Conflict of Interest disclosure form on a regular basis.
- We will disclose the relationship of the System with other health-care organizations, providers, payers and educational institutions.
- Our outside commitments will not significantly impose on the levels of time or effort owed to the organization.
- We will not solicit, accept or receive gifts or gratuities of more than nominal value from organizations or persons who do business with the System.
- We will not offer, give, solicit or receive any form of bribe or other improper payment for the direct or indirect referral of patients or business, or for special treatment purposes.
- We will act in the best interests of West Penn Allegheny Health System without regard to personal interests or influence of outside parties.
- We will make decisions and decide appropriate actions based on the vision and the values of West Penn Allegheny Health System.
- We will not use the resources of West Penn Allegheny Health System (equipment, staff, utilities, etc.) to earn money or other compensation for our own benefit.
- We will expect that all information provided to the government is truthful, accurate and timely.
- We will not provide or pay for meals, refreshments, travel or lodging expenses for government investigators or auditors.

CODE OF ETHICS

WE HAVE A COMMITMENT TO OUR EMPLOYEES

- We will treat employees fairly, providing professional development and advancement opportunities without regard to race, color, gender, sexual orientation, religion, creed, age, disability, national origin, veteran or military status, or any other factor protected by law.
- We will not tolerate harassment of any kind or intimidating and disruptive behaviors whether overt or passive such as verbal outbursts, physical threats, refusing to perform assigned tasks or uncooperative attitudes.
- We will comply with all applicable wage and hour laws and other statutes regarding the employer-employee relationship.
- We will be aware of individual duties and will effectively perform them during disasters and code situations.
- We will promote a safe workplace environment for employees, patients and customers. Unauthorized weapons of any kind are prohibited on any West Penn Allegheny Health System campus.
- We will not permit the use, sale, possession, manufacture or purchase of illegal drugs, nor the sale or manufacture of alcohol while at work or on workplace premises. Although certain hospital events may be approved to serve alcohol on a case-by-case basis by the President and CEO in writing, we will not permit the use or possession of alcohol by individuals on duty or on-call. We will not be allowed to report to work while under the influence of illegal drugs, legal drugs improperly used, or alcohol.
- We will be diligent and vigilant in carrying out our obligations to handle and dispense prescription drugs and controlled substances in accordance with all applicable laws, regulations and internal policies.
- We will devote our entire working time to the performance of our duties and the service of our constituencies.
- We will respect the privacy of our fellow employees.
- We will not hire, or have a reporting relationship to, relatives or significant others without first disclosing that information to our supervisor and securing written permission.
- We will compensate contracted health-care professionals only for actual services provided and at their fair market value. Compensation will not be based upon the volume or value of any business referred to the System.

CODE OF ETHICS

WE MAINTAIN A SAFE AND HEALTHY WORK ENVIRONMENT

- We will observe and comply with all federal, state and local health, safety and environmental laws.
- We will properly dispose of, handle or store medical waste, environmentally sensitive materials, hazardous materials, infectious materials and medical equipment.
- We will use personal protective equipment appropriately.
- We will use all equipment in a safe manner and in conformance with operating instructions.
- We will promptly report any spills or accidents involving infectious or hazardous materials for proper handling.
- We will understand and follow all safety-related standards and regulations.
- We will report any existing or potentially dangerous conditions that are a threat to the health and well-being of individuals or that are violations of any policy.
- We will strive to conserve natural resources in managing and operating our business affairs. We will use resources appropriately and efficiently, recycling where possible.
- We will report noncompliance issues to our supervisors, the Safety Officer, or a member of the Safety Committee, working cooperatively with appropriate authorities to remedy any environmental contamination for which West Penn Allegheny Health System may be responsible.

CODE OF ETHICS

WE PROTECT CONFIDENTIALITY AND RESPECT OUR PATIENTS AND OUR ORGANIZATION

- We will maintain the confidentiality of all patient and private information. We will handle all confidential information appropriately, so as to protect against improper use or access. We will release patient information and medical record contents only in accordance with federal and state privacy laws, and West Penn Allegheny Health System entities' policies and procedures.
- We will inform our patients of their health information privacy rights and how West Penn Allegheny Health System protects their health information in a notice of privacy practices.
- We will not use any confidential information directly or indirectly for personal gain.
- We will support each patient's right to review information contained in his or her medical record, request amendments to the record, request restrictions, confidential communications or accountings of where each patient's information was disclosed while under care at any West Penn Allegheny Health System facility. All patient requests will be evaluated and those deemed reasonable or required by law will be fulfilled.
- We will enter into business relationships only with those vendors and independent consultants who abide by our standards of patient privacy, ethics and compliance.
- We will be truthful in our advertising and marketing activities regarding all of the services we provide.
- We will exercise reasonable judgment in using West Penn Allegheny Health System's financial resources, spending them carefully, as if they were our own.
- We will protect West Penn Allegheny Health System's assets, property, facilities, equipment and supplies against theft, loss, damage and misuse.

YOUR RESPONSIBILITY AS AN EMPLOYEE

Maintaining high standards of excellence is in everyone's best interest. As an employee of West Penn Allegheny Health System, you have an obligation to:

- do your best to assure that all interactions and associations with patients, co-workers, community members and businesses are honest and law-abiding;
- be familiar with and adhere to all company policies and procedures, and all laws and regulations applicable to your duties and the operations of West Penn Allegheny Health System;
- make the appropriate individuals within the organization aware of potential violations of the Code of Ethics or any policy, procedure, law or regulation so that problems may be remedied;
- discuss legal and ethical issues that arise while performing your job and report any concerns to appropriate persons within the organization for investigation or follow-up; and,
- represent West Penn Allegheny Health System professionally and responsibly.

POLICY FOR PREVENTING AND DETECTING FRAUD, WASTE AND ABUSE IN FEDERAL AND STATE HEALTH-CARE PROGRAMS

As a health-care provider, the West Penn Allegheny Health System is monitored by a broad array of governmental and private entities, each with their own set of rules and regulations. Nowhere is this heightened scrutiny more apparent than at the federal level, where the preventions and detection of health-care fraud, waste and abuse is now a paramount priority. Individuals and institutions who commit health-care fraud, waste and abuse regarding payment for services under Medicare and Medicaid are subject to a wide variety of penalties. Such penalties include criminal liability, civil and administrative fines, exclusion from the Medicare and Medicaid programs and loss of medical license. The health system is committed to promoting a culture which encourages and assists employees, staff, officers, directors and when applicable contractors and agents to conduct health system operations with integrity and in compliance with applicable laws, regulations and policies including but not limited to:

- FALSE CLAIMS ACT (31 U.S.C. Section 3729);
- ANTI-KICKBACK STATUTES (42 U.S.C. 1320a-7b);
- STARK ACT (42 U.S.C. 1395nn; 42 CFR 411 et.seq.; and 66 F.R. 856); and
- PENNSYLVANIA RESTRICTIONS that ban the following arrangements by or with physicians:

The referral of medical assistance patients for financial consideration, or the solicitation of such an arrangement; the offering or paying of remuneration for referrals of patients for service or supplies; the execution of a rent or lease arrangement unless the space is leased for fair market value; the solicitation or receipt of a kick-back, payment, gift, bribe or rebate with regards to a good, facility, service or item for which payment is made under a state medical assistance program; and the referral of medical assistance patients to independent laboratories, pharmacies, radiology, or other ancillary medical service facilities in which the physician or group has an ownership interest.

More detail about these laws can be found at the citations provided or in the Policy for Preventing and Detecting Fraud, Waste and Abuse in Federal and State Healthcare Programs in each institution's policy manuals.

NON-RETALIATION POLICY

It is the policy of the West Penn Allegheny Health System entities that no manager, supervisor or employee is permitted to engage in retaliation or any form of harassment directed against an employee or staff member who reports a compliance or ethics concern.

Provisions under applicable federal and state laws afford similar protections to employees who make a good faith report of wrongdoing or waste, verbally or in writing, to one of the employee's superiors, a compliance resource person, to an agent of your employer or to an appropriate authority. These protections prevent an employer or an agent of the employer from discharging, threatening or otherwise discriminating or retaliating against an employee's compensation, terms, conditions, location, or privileges of employment because the employee or a person acting on behalf of the employee makes a good faith report or is about to report, verbally or in writing, to the employer or appropriate authority of wrongdoing or waste.

In addition, West Penn Allegheny Health System employees and staff members are responsible to promptly report concerns relative to compliance or ethics violations.

West Penn Allegheny Health System does not permit or condone retaliation or retribution against any employee who, in good faith, reports a legal or ethical concern.

Any manager, supervisor or employee who engages in such retaliation or harassment is subject to discipline, up to and including dismissal upon the first offense. The Human Resources Department will be responsible to monitor application of this policy. All substantiated instances of retaliation or harassment against reporting employees will be provided to the System Compliance Officer.

HOW TO REPORT CONCERNS OR PROBLEMS

1. Talk to your supervisor about your concerns. Give your supervisor an opportunity to resolve the issue.
2. If your supervisor has not addressed the issue, you should relay your concerns to the next management level such as your Department Director or Vice President.
3. If your management is unable to resolve the issue satisfactorily, you should contact your organization's Compliance Liaison, a Human Resources representative, internal Legal Counsel, the System Compliance department, and/or the Compliance Line.

The Compliance Line is designed to permit any employee to call or e-mail and report a compliance-related concern or to obtain clarification on compliance issues.

Calls to the Compliance Line are answered confidentially by trained operators from an outside agency 24 hours a day, 7 days a week. There is no caller ID function on the Compliance Line, and callers are not required to identify themselves. If you desire to remain anonymous, you will be given a follow-up code to use if you wish to call back and check the status of West Penn Allegheny Health System's response to the problems or concerns you report.

Issues can also be reported to the Compliance Line via the Internet at www.mycompliancereport.com. Users should select "Begin New Report" and enter access code "WPH" to identify this is an issue occurring at West Penn Allegheny Health System. You will then be asked the specific location of where the issue is occurring, but you do not have to provide your name and can still remain anonymous.

West Penn Allegheny Health System's Compliance Line is:

1-877-867-7325

1-877-TO-SPEAK

<http://www.mycompliancereport.com>

(access code is WPH)

VIOLATIONS OF LAW, REGULATION OR THE SYSTEM COMPLIANCE AND INTEGRITY PROGRAM

All West Penn Allegheny Health System employees are expected to abide by the standards outlined in this booklet, as well as all System policies and procedures, and all laws and regulations that affect the operations of our business. West Penn Allegheny Health System will enforce disciplinary actions on individuals for violations of any standards, policies, procedures, laws and regulations.

Disciplinary action will be taken for:

- Authorization of, or participation in, actions that violate the standards, policies, procedures, laws and regulations;
- Failure to report a violation of the standards, policies, procedures, laws and regulations, or to cooperate in an investigation;
- Failure by a violator's supervisor(s) or manager(s) to detect and report a violation of the standards, policies, procedures, laws and regulations, if such failure reflects inadequate supervision or lack of oversight; or,
- Retaliation against an individual for reporting a violation, or possible violation, of the standards, policies, procedures, laws and regulations.

Disciplinary action may result in verbal or written warnings, corrective action programs or employment termination. Disciplinary action will be determined in accordance with West Penn Allegheny Health System administrative policies and procedures.

MAKING THE RIGHT DECISION

When confronted with an ethical issue or situation, ask the following questions before making a decision or taking any action.

- Will my action be in accordance with West Penn Allegheny Health System's Code of Ethics?
- Will my action be appropriate considering West Penn Allegheny Health System's core purpose and mission?
- Will my action be legal?
- Will I feel good about my decision and my action?
- Would I want others to know of my decision or action?

If you answer yes to all of the above questions, then it is likely that you have made a good decision. If you have any doubts, please discuss the decision or action with your supervisor or contact the Compliance Line by phone or e-mail.

**SYSTEM COMPLIANCE AND INTEGRITY PROGRAM
CODE OF ETHICS ACKNOWLEDGMENT**

I acknowledge that I have received West Penn Allegheny Health System’s Compliance and Integrity Program Code of Ethics guide. I have read the guide and intend to comply with its terms throughout my association with the organization. I understand that the Code of Ethics represents organization policies and that violation of the Code will result in appropriate disciplinary action.

Signature:

Printed Name:

Employee Number:

Facility (*if employee*) / Company Name (*if vendor*):

Department Name / Number:

Title / Position with Organization:

Business Telephone Number:

Date



WEST PENN ALLEGHENY HEALTH SYSTEM

COMPLIANCE PROGRAM
412-330-4960
AN EQUAL OPPORTUNITY EMPLOYER

101-20 Rev. 12/08-sb