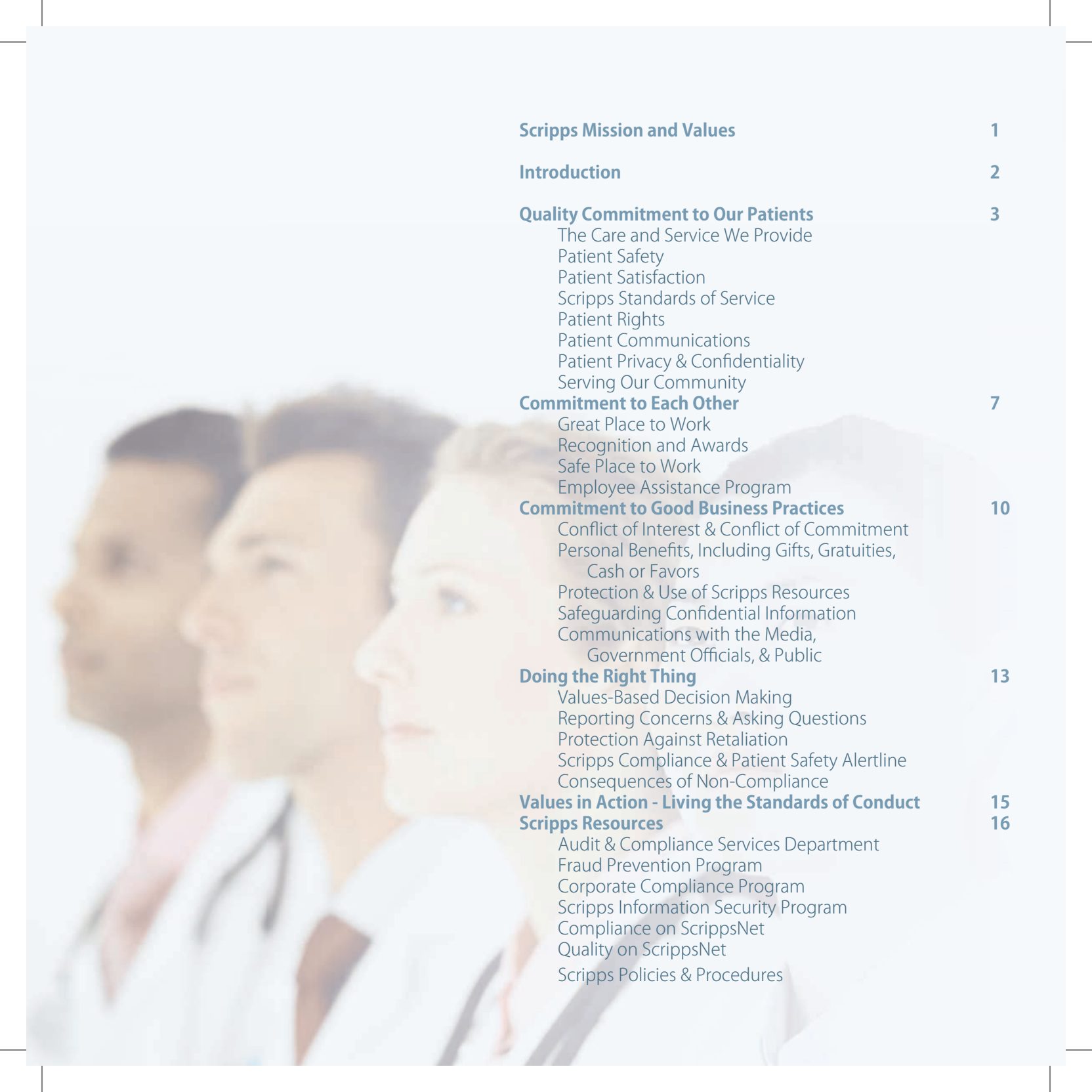




Standards of Conduct

An employee guide to doing the right thing.





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Scripps Mission & Values

Mission

Scripps strives to provide superior health services in a caring environment and to make a positive, measurable difference in the health of individuals in the communities we serve.

We devote our resources to delivering quality, safe, cost effective, socially responsible health care services. We advance clinical research, community health education, education of physicians and health care professionals, and sponsor graduate medical education.

We collaborate with others to deliver the continuum of care that improves the health of our community.

Values

We provide the highest quality of service.

Scripps is committed to putting the patient first, and quality is our passion. In the new world of health care, we want to anticipate the causes of illness and encourage healthy behavior for all who rely on us for service. We teach and encourage patients to participate in their care and to make well-informed decisions. We will be their advocate when they are most vulnerable. We measure our success by our patients' satisfaction, their return to health and well-being, and our compassionate care for dying patients, their families and friends.

We demonstrate complete respect for the rights of every individual.

Scripps honors the dignity of all persons, and we show this by our actions toward one another and those we serve. We embrace the diversity that allows us to draw on the talents of one another. We respect and honor the cultural, ethnic and religious beliefs and practices of our patients in a manner consistent with the highest standards of care. All this is done in a compassionate setting. Our goal is to create a healing environment in partnership with all caregivers who are committed to serving our patients.

We care for our patients every day in a responsible and efficient manner.

Scripps serves as a major community health care resource for San Diego County and, as such, we are accountable for the human, financial and ecological resources entrusted to our care as we promote healing and wholeness. We begin from a base of excellence and collaborate with co-workers, physicians, patients, and other providers to find new and creative ways to improve the delivery of health care services. All members of our community will have access to timely, affordable and appropriate care.



Introduction

The Standards of Conduct reflect the clear commitment by Scripps Board of Trustees, leadership, physicians and employees to foster an atmosphere of integrity, honesty and compliance with all applicable laws and regulations. These Standards of Conduct serve as a primary education and communication tool for employees and volunteers that demonstrate how Scripps mission and values influence the way we provide patient care, conduct daily business, interact with each other, and make everyday decisions. Every individual at Scripps is responsible for upholding these guiding principles and for providing care and conducting business in a manner consistent with these standards.

Quality Commitment to Our Patients

The Care and Service We Provide Delivering the Highest Quality Care to Every Patient, Every Time

At Scripps, it's always about our patients; working together to develop what's best for their care and safety, and then implementing best practices system-wide. All of us have a role in promoting a culture of quality and safety at Scripps. We do this by looking for risks in our workplace, reporting errors and hazards, helping to design safe systems and making choices that are safe.

Some of the keys to being successful in these goals are clear and continuous communication about quality and safety issues and timely sharing of ideas and best practices. We enhance the services we provide to our patients when we are able to bring consistency and standards into the care and service we provide – both within our own departments and throughout the organization.

High quality health care should be:

- **Safe** - avoiding injuries for those who provide and receive care;
- **Effective** - providing services based on scientific knowledge to those who may benefit, and refraining from providing services to those unlikely to benefit (avoiding underuse and overuse, respectively);
- **Patient Centered** - providing care that is respectful of, and responsive to, individual patient preferences, needs and values and ensuring that patient values guide clinical decisions;
- **Timely** - reducing delay, both for those who provide and receive care;
- **Efficient** - avoiding waste, including waste of equipment, supplies, ideas and energy;
- **Equitable** - providing care that does not vary in quality because of personal characteristics, such as gender, ethnicity, geographic location or socioeconomic status; and
- **Compassionate** – providing care from a compassionate and inspired work force.

Quality means focusing on patient care and outcomes, as well as patient safety and satisfaction.



Patient Safety

Protecting our patients' safety is our highest priority because it is the foundation of delivering the highest quality health care.

Transparency related to unexpected or adverse outcomes, including the full disclosure of medical errors, is central to our patient safety culture. Improving patient outcomes, while reducing medical errors, depends on measuring, monitoring and learning from adverse outcomes and associated failures. For example, in any near miss situation, non-compliance related event or error, we believe there is value in understanding how the event occurred, in order to prevent future occurrences.

Each employee is obligated to report any safety concerns for our patients, visitors and each other. In doing so, we make our systems and workplace safer. We would much rather avoid a safety incident, than respond to one. If an employee has any questions about the quality of care, or if an employee has an idea that might improve the care we provide, he or she should promptly share their concern or idea with their supervisor, a member of management, and/or the Scripps Compliance & Patient Safety Alertline (1-888-424-2387). If the Alertline is used, a case number will be provided to the employee so that they may follow up and ensure a complete feedback loop has occurred.

Scripps encourages employee feedback on patient safety by offering employees the opportunity to participate

in an annual patient safety survey which is used to help assess the culture of safety in our organization.

Patient Satisfaction

We are committed to continually improving patient satisfaction at Scripps. We constantly seek feedback from our patients and their families in order to improve the overall patient experience. Patient surveys are sent to hospital inpatients, and to outpatients from the hospitals and clinics.

The surveys ask patients about their Scripps experience, and specifically requests information regarding;

- **Communication with nurses.** Did nurses listen carefully and respectfully to the patient's concerns, and clearly explain aspects of his or her care?
- **Responsiveness of hospital staff.** Did the patient receive help when it was needed? Was it provided promptly?
- **Communication with doctors.** Did doctors listen carefully and respectfully to the patient's concerns, and clearly explain aspects of his or her care?
- **The hospital environment.** Was the facility clean and quiet?
- **Pain management.** Did care providers manage pain effectively?
- **Communication regarding medications.** Did staff adequately inform the patient about new medications and any possible side effects?
- **The discharge process.** Did staff discuss possible symptoms and side effects of after care with the patient? Did they ask the patient if he or she needed help at home?

Quality improvement teams at each facility analyze the survey results to pinpoint and address problems, as well as to identify successful practices within individual departments that can be implemented across the entire Scripps system.

Scripps Standards of Service

Scripps is committed to providing the highest quality care and service for our patients and community. Our employees are expected to consistently demonstrate this commitment to quality care and service by providing excellent service to our patients, family members and colleagues. To this end, an online learning module is available on ScrippsNet for all employees to receive further education to the Scripps Standards of Service and service excellence expectations.

Scripps Standards of Service:

- I will create a positive first impression, welcoming patients and families to the Scripps World of Healing.
- I will communicate effectively and provide information to assure patients that they are in the best place for care.
- I will create and maintain a clean, safe and private environment, respecting the dignity of our patients and their families.
- I will strive to ensure that our patients and families are completely satisfied with our care and service.

Patient Rights

Scripps recognizes that each patient is an individual with unique health care needs, and is committed to assisting each individual to exercise their rights in determining their own care decisions. This means:

- We involve family and individuals, as defined and designated by the patient, in decisions regarding care, treatment and services.
- We learn about and respect individual cultural and spiritual values and provide care and service in a way that safeguards personal dignity and self-respect.
- We strive to provide medically necessary services that meet each patient's identified needs.
- We support and advocate for our patients' rights, as reflected in the standards of professional practice and organizational policies.

Patient Communications

Unanticipated Outcomes

Patients are entitled to information about the state of their health. This includes information on the outcomes of diagnostic tests, medical treatment and surgical interventions, whether the outcomes are expected or unanticipated. Sometimes, diagnostic tests or treatments result in unplanned or unwelcome outcomes. In these cases, disclosure of outcomes should be provided to patients by their physicians and/or appropriate administrative staff.



Marketing

In all of our marketing and public communication efforts, our objective and standard is to communicate fair and accurate information about Scripps and our capabilities. Our goal, through communications and marketing, is to accurately reflect the services we offer and specific licensure and accreditation of each of our facilities.

Financial

When presenting financial obligations and options to our patients, we are committed to being objective and fair. We act ethically in patient financial matters and strive to communicate effectively to assist patients in resolving their financial obligations. For this reason, information about the relationship between the use of services and financial obligations or Scripps interest is available to all patients and their families, clinical staff, physicians and other personnel.

Patient Privacy & Confidentiality

It is an expectation of quality health care that we maintain our patients' privacy and confidential information in strict confidence. When patients choose Scripps for their care they most often are sharing the very most personal and sensitive information about themselves. Our responsibility is to treat their information with respect and protect it from being shared with individuals who do not have a need to know. In order to fulfill our obligations to our patients, Scripps has developed policies that both establish best practices for the management of personal and confidential information as well as support and encourage patients to exercise their rights regarding their medical information.

All Scripps patients receive the Scripps Notice of Privacy Practices at the time of their first encounter with Scripps. This notice informs patients of:

- Their rights regarding their information;
- Our responsibilities to protect their confidential information;
- How we may use and disclose their protected health information and where they can go for questions and concerns regarding their health information.

Keeping your patients' information private must be a conscious effort as you conduct your daily work.

Some very important practices are:

- Identify whether the patient's name is in the hospital directory or if they have requested to be excluded and do not want their presence in the hospital disclosed to individuals who inquire about them.
- When sharing confidential patient information, always verify that the recipient has the right (is authorized) and the need for the information. Only use or share the minimum amount of information necessary to get the job done.
- To protect patient privacy while in the hospital, allow patients to identify individuals that they would like us to share relevant information with. Ensure that the identity of these individuals is communicated to the care team.
- Minimize information from being disclosed unintentionally, for example; draw curtains in semi-private rooms, turn on a radio or TV to create white noise or sit at the bedside level with the patient.
- Share sensitive information with other care providers in a private location.

- Provide patients with the opportunity to agree to have individuals stay or be excused before you discuss their care or provide service (i.e. administering medications). Do not assume that the patient wants visitors or family to hear any information.

Scripps Privacy Program- The Privacy Program is the aspect of the Scripps Compliance Program that is focused on the Federal HIPAA Privacy Regulations and California Confidential Medical Information Act laws which strives to safeguard protected health information (PHI) as well as personal financial information (PFI). Key aspects of the program include: monitoring of privacy practices at all business units, revising policies and appropriate forms, conducting ongoing education, monitoring information system access, investigating privacy incidents and coordinating privacy related process improvements.

Serving Our Community

We serve the community by providing quality patient care, creating jobs and providing valuable health services. Our commitment to community health improvement also includes activities to raise public awareness of health care issues, provide for health education and prevention, and make health care services more accessible for those in need.

- **Uncompensated Care.** As a health care system dedicated to the community, Scripps is a necessary part of San Diego's health care "safety net," providing care to many who need it but don't have the ability to pay.
- **ScrippsAssists.** Scripps supports the ScrippsAssists employee volunteer club, comprised of Scripps

employees and affiliated physicians who want to help make a difference in the health of our community.

- **Community-Based Health Improvement.**

In addition to local health fairs, education, screenings and support groups, Scripps actively supports a number of community health programs, and established the Community Benefit Fund to provide financial support for initiatives that meet community health care needs and promote Scripps' mission and values.

- **Professional Education and Research.** Quality health care is highly dependent on health education systems and medical research programs. To this end, Scripps invests millions each year in professional training programs and clinical research.

A complete report on our community benefit efforts is available through the Scripps health and advocacy office.

Commitment to Each Other

Great Place to Work

Our goal at Scripps is to provide employees with a great place to work – one where employees trust the people they work for, have pride in what they do, and enjoy the people they work with. Our commitment is to regularly solicit employee feedback and suggestions. Employees' involvement is crucial to continually improving the workplace. Each year in May, Scripps conducts the Great Place To Work survey

for all employees, and holds various employee focus groups. Employee feedback is used to identify areas of improvement within departments and facilities. After closer study, work plans are developed at each site and department, and are implemented and monitored throughout the year. Scripps commitment to Great Place To Work has grown, along with steadily increasing employee involvement. We continue to learn more about the workplace attributes that are important to employees, and this information is helping us plan and develop programs so that Scripps remains an employer of choice in San Diego.

Recognition and Awards

The Values in Action and Values in Leadership awards are designed to recognize individuals and teams who make outstanding contributions to health care through their leadership, or by demonstrating Scripps values of quality of service, respect for every individual, and responsible and efficient patient care. Individuals who contribute to the organization through their personal commitment to their position, peers and patients, as well as model the values of the organization, are eligible to be nominated for this prestigious award. All employees, physicians, board members, Sisters of Mercy and volunteers are eligible for the Values in Action Awards.

Safe Place to Work

Safe Work Environment. Scripps strives to maintain a safe, cooperative, and professional health care environment, and is committed to providing employees with a safe work environment. This includes providing you with training, education and information to prevent

injury or illness. Everyone is responsible for a safe work environment. Every individual at Scripps is responsible for knowing, understanding and following the health and safety policies and regulations that apply to their job and work environment. Employees at all levels are required to actively participate in and support ongoing safety programs. If any individual sees an injury or accident, or an unsafe situation, he or she should immediately report it to a supervisor and complete an occurrence report. Scripps also requires employees at all levels to actively participate in and support ongoing safety programs.

Drug and Alcohol Free Workplace. Scripps requires a drug-free workplace. Employees may not be under the influence of any substance, including alcohol or prescribed medications, that could prevent you from working safely and effectively, while on duty or on call.

Violence-Free Workplace. Scripps is committed to maintaining a work environment free from acts or threats of violence. Scripps does not permit any behavior that puts the safety of our patients, customers, employees, volunteers, vendors or visitors in danger.

A Workplace Free of Harassment and Inappropriate Behavior. Scripps is committed to providing a workplace free of harassment. A harassment-free workplace includes a work environment that is free from disruptive or inappropriate behavior that may intimidate staff or impact morale. This includes sexual harassment, as well as harassment based on such factors as gender, pregnancy, race, color, religion,



national origin, ancestry, age, gender identity, physical or mental disability, medical condition, marital status, sexual orientation, family care leave status or veteran status. Harassing conduct can take many forms and includes, but is not limited to, slurs, jokes, statements, gestures, pictures or cartoons regarding any of the characteristics listed above.

Scripps strongly disapproves of, and does not tolerate harassment of employees by managers, co-workers or by non-employees or any person with whom our employees has a business, service or professional relationship (such as customers, patients, physicians and/or vendors). For more information on our anti-harassment policies, please refer to the Scripps harassment-free workplace policy.

Any employee who observes or is the subject of harassing or inappropriate behavior by a co-worker, medical staff member, contractor, patient or vendor

should immediately notify his/her supervisor, another member of management, human resources, or the Scripps Compliance and Patient Safety Alertline (1-888-424-2387).

Employee Assistance Program

In an effort to support and improve the quality of work-life balance, and in recognition of the value our employees bring to our organization, Scripps established the confidential Employee Assistance Program (EAP) to help employees and their family members cope with stressful situations and problems at work and at home. Services provided by licensed EAP counselors are free, and EAP referrals to other programs may be covered under medical or mental health insurance plans. Employees, physicians, volunteers and their family members are eligible for EAP services immediately upon their date of hire.

Commitment to Good Business Practices

Conflict of Interest & Conflict of Commitment

Scripps conflict of interest and conflict of commitment policy establishes the standards of expected conduct for Scripps and its employees, provides guidelines to avoid conflicts of interest or unethical or unlawful practices, and ensures that health care and related activities are conducted free from undue influence, or the perception of such influence, arising from outside obligations.

Employees are expected to maintain appropriate relationships with third parties, including patients and their families, health care practitioners, donors, suppliers, subcontractors and competitors so that no third-party has an opportunity, or appears to have an opportunity, to inappropriately influence Scripps' decisions or activities.

Scripps encourages employees to participate in public service and professional organizations. However, conflicts of interest and/or commitment must be avoided. Employees should not use organizational resources or paid Scripps time for personal, or non-Scripps business purposes. Your supervisor must determine whether outside activities may be considered Scripps business.

Personal Benefits, Including Gifts, Gratuities, Cash or Favors

Cash or Cash Equivalents: Cash or cash equivalents cannot be accepted. No employee or family member shall accept a cash, or cash equivalent, of ANY amount. A cash equivalent includes, but is not limited to, checks, gift certificates, gift cards and stocks.

Personal Gifts, Favors or Benefits: No personal gifts, favors or benefits should be accepted by an employee unless the item has a value of less than \$300, and the annual aggregate of any such gifts does not exceed \$300 from any single third party. All personal gifts, favors or benefits with value exceeding \$50 must be immediately disclosed to an employee's supervisor and must be documented on the employee's annual conflicts of interest disclosure form as applicable.

Employees in a position to refer patients who are federally funded health care beneficiaries to other providers and services may not accept personal gifts, favors or benefits in any amount from any third party which provides care, services, equipment, medications or other benefits to Medicare or Medi-Cal program beneficiaries.

Protection & Use of Scripps Resources

Scripps entrusts employees with numerous company assets and resources, including financial assets, facilities, computer and network resources, equipment, materials and supplies. These and other

assets are maintained for Scripps' business purposes and benefit. As an employee, you are responsible for protecting these assets from loss, damage, misuse or theft.

Safeguarding Confidential Information

Our patients and employees have the right to expect that confidential information used and stored by Scripps will be protected and kept confidential. Confidential information must always be safeguarded from unauthorized use and disclosure. Our patient care and business operations increasingly depend on the integrity, reliability, and availability of electronic data and images that are housed, processed, and exchanged on Scripps information systems and networks. If our clinical, financial or proprietary information is not safeguarded properly, patient care, business operations, and our ability to meet regulatory requirements could be seriously compromised. The way we secure our information has a direct impact on our reputation, operational success, regulatory compliance and ability to do business.

Access to Scripps electronic systems is a privilege that employees retain through their responsible compliance with Scripps computer, network, and e-mail usage policy. All employees are required to sign the confidentiality and non-disclosure agreement annually during the annual performance review process. This document outlines employees' key responsibilities with regard to Scripps confidential information. This agreement requires employees to confirm that:

- They understand that any confidential information they may receive or learn from any source during the course of their employment at Scripps does not belong to them and, accordingly, Scripps, at its sole discretion, may remove, or restrict, any employee's access to confidential information, at any time and for any reason.
- They will not misuse any confidential information, and will only access such information as is necessary to accomplish their assigned job duties.
- They will not use, download, or disclose any confidential information at any time, or for any purpose, unless required to do so in the performance of their Scripps-related duties.
- They will not access, view, copy, photograph, or in any other manner obtain, any protected health information (PHI) or personal financial information (PFI) that is not required for performance of their work for Scripps. This specifically includes any information that pertains to the employee, or to any member of his or her family.
- They will take all necessary steps to safeguard confidential information at all times in accordance with the law and Scripps policies, including Scripps policies regarding record retention and authorized record destruction.
- They will protect their computer passwords and will not share them with any individual. They acknowledge that their user IDs and passwords are their "electronic signature" and that they are accountable for all access and actions under their log-on.
- On termination of employment or engagement with Scripps, or at any other time as requested to do so, they will immediately return to Scripps all documents or property containing any confidential information in their possession, custody or control.

Communications with the Media, Government Officials & Public

Communication with Media

Information reported in the news media can affect Scripps reputation and it is therefore critical that Scripps present information to the news media in a clear, accurate, positive and professional manner. As one of the largest health care delivery systems in San Diego County, Scripps receives numerous inquiries from the news media, which can include local and regional newspapers, magazines, radio or television. To ensure the release of factual and accurate information, if an employee is approached by the media for information or comment, he or she must contact the marketing and communications department at the facility, or call the general Scripps marketing and communications department number 858-678-7175, or after normal business hours call

the on-call pager at 858-494-2574. This requirement applies to all media inquiries and requests regarding patients, services, fees, employment matters or other organizational matters and practices including:

- Responding to calls from the news media;
- Release of patient information;
- Conducting and/or calling the media about a Scripps story or news item;
- Publishing an article about Scripps services or patients;
- Conducting interviews with media at public events, exhibits or conventions, or endorsing a product or company that is currently associated with Scripps;
- Endorsing written marketing materials or free or paid advertisements on behalf of Scripps.

Communication with the Public

Employees who are experts in a certain subject matter area, employees who are members of



executive management, may be asked to act as a spokesperson on behalf of Scripps in certain situations. All other employees, when communicating with the general public, public interest groups, professional organizations, etc., must be clear that they are not a spokesperson for Scripps, and are not making any statement of behalf of the organization.

Information released about Scripps patients can only be disclosed by those so authorized to do so and in accordance with Scripps policy information, disclosure of patient directory to the public. An unauthorized or inappropriate disclosure of patient information can subject Scripps and/or the individual disclosing to penalties or fines for negligently disclosing or knowingly and willfully obtaining, disclosing, or using medical information in violation of state/federal laws.

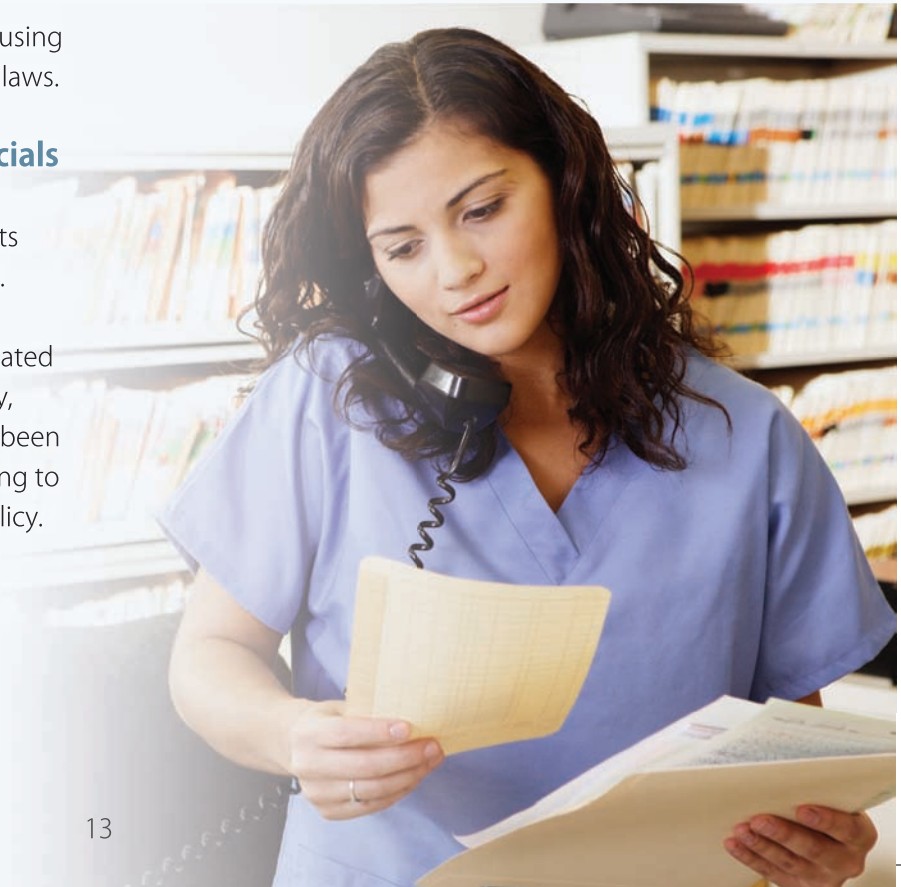
Communication with Government Officials

It is Scripps' policy to fully cooperate with all government agencies, while protecting the rights of the organization, our employees and patients. Guidelines for the proper, accurate, and timely response by Scripps in the event of an unanticipated inquiry or investigation by a government agency, including subpoenas and search warrants, have been developed and are included in Scripps responding to investigation/inquiry by government agency policy.

Doing the Right Thing

Values-Based Decision Making

As employees of Scripps, we are all expected to make good decisions. To assist employees in making decisions that are aligned with our mission and values, Scripps educates management personnel through the Center for Learning and Innovation in the understanding and use of the Scripps values-based decision making framework. The framework helps ask the right, values-based questions, which will help lead to the right decisions. More information on values-based decision making is available from your supervisor.





Reporting Concerns & Asking Questions

As a member of the Scripps organization, each employee plays an important role in our corporate compliance program. All persons, regardless of their position or employment status, are expected to become familiar with and act in accordance with these Standards of Conduct, and the laws and regulations that affect the performance of their jobs. We encourage any individual who has any questions or concerns regarding Scripps Standards of Conduct, or any law or regulation, or any Scripps policy or practice, to promptly discuss it with a supervisor or member of management.

If any employee becomes aware of any situation where legal compliance is in question, patient or employee safety is concerned, unfair business practices are occurring or the reputation or integrity of the Scripps organization is being compromised, the employee must promptly report the facts so that Scripps may investigate and resolve the issue. An employee should report these types of concerns to

their supervisor or another member of management, audit & compliance services 858-678-6806, or the Scripps Compliance & Patient Safety Alertline (1-888-424-2387). Concerns related to safety or quality of care may also be reported directly to The Joint Commission by mail, fax or on-line at www.jointcommission.org/GeneralPublic/Complaint/.

Protection Against Retaliation

Both federal and California laws offer protection for whistleblowers from retaliation for reporting illegal conduct. In addition, Scripps prohibits any retaliation against any employee for reporting any conduct or activity that the employee reasonably and in good faith believes to be a compliance, safety or legal concern.

Scripps Compliance & Patient Safety Alertline

A confidential “hotline” called the Scripps Compliance & Patient Safety Alertline has been established to provide a simple, risk-free way for you to report compliance or business practice concerns. Reports can be made anonymously. The “hotline” is available toll-free, 24 hours a day, 7 days a week at **1-888-424-2387.**

concern, our follow up processes are designed to ensure confidentiality, integrity and objectivity for prompt investigation and resolution of all reported concerns. Scripps will not tolerate retribution or retaliation against any person, who in good faith, reports a compliance violation or concern. Scripps will make efforts to protect your identity to the extent allowable by law. Of course, anonymity cannot be protected if individuals identify themselves or provide information that can be used to identify them.

Consequences of Non-Compliance

Non-compliance with the Standards of Conduct or Scripps policies and procedures can damage the reputation and image of Scripps. In certain cases, violations of the Standards of Conduct or Scripps policies could subject our organization, as well as individuals, to civil and/or criminal penalties. All employees will be held accountable for failing to comply with the Standards of Conduct, Scripps policies, or federal and state laws, statutes and regulations. All members of management are also accountable for the actions of their direct reports if they have not kept them appropriately informed or trained in specific requirements of their workplace, or have not provided proper counseling when problems have occurred. Corrective action, up to and including termination, will be consistently applied for all employees involved in non-compliance.

California Privacy Laws now include penalties/fines for any individual that negligently discloses or knowingly and willfully obtains, discloses or uses medical information in violation of state / federal laws.

VALUES IN ACTION

Living the Standards of Conduct

Scripps employees are accountable for their own behavior choices. Knowing Scripps policies and using common sense and good judgment serve as a guide in determining appropriate behavior and the best course of action to take. If you encounter a situation where the course of action is unclear, the following questions may be useful in choosing how to act:

- **Are there relevant Scripps' policies and procedures that will provide direction?**
- **What is the action that would be in the best interest of Scripps and the patients we serve?**
- **Are my actions aligned with Scripps values?**
- **Am I being fair and honest?**
- **Am I making a choice that is safe for patients and co-workers?**
- **Would I be able to explain and justify my actions if challenged?**

If you are still in doubt or need clarification after considering these questions, discuss the situation with a supervisor or another member of management at your facility.

Scripps Resources

Audit & Compliance Services Department

The audit & compliance services (ACS) department is responsible for bringing a systematic, disciplined approach to evaluate and improve the effectiveness of the Scripps risk management, internal control, compliance, information security and governance processes. ACS has specific responsibilities for the corporate compliance program, internal audit, privacy program, information security program, anti-fraud prevention program and system-wide on-line policies library.

Fraud Prevention Program

Scripps promotes a culture that reduces its susceptibility to fraudulent acts, and implements a system of internal controls and monitoring processes to ensure a high probability of deterring and detecting fraud. Employees should be observant and maintain an appropriate level of vigilance in conducting patient care and Scripps business. Employees must report all suspected fraudulent activities or situations to ACS prior to taking any investigatory or personnel action(s). A system-wide fraud prevention policy "Fraud Prevention Program: Incident Identification Reporting and Investigation" has been implemented to articulate antifraud roles and responsibilities across the organization and educate employees about their responsibility to report all incidents of known fraud as well as issues or irregularities that involve cash, check or credit card discrepancy or questionable transactions of \$500 or greater, missing fixed assets or supplies

with a value of \$5,000 or greater, or any questionable transaction or issue involving a supervisor-level employee or higher.

Corporate Compliance Program

The Scripps corporate compliance program was established to guide and assist the Board of Trustees and senior management in effective implementation of policies and procedures, oversight and monitoring processes, and effective communication mechanisms to ensure ethical business practices and incorporate principles of integrity within Scripps' culture and way of conducting business. The compliance program and related activities are designed and communicated in a manner consistent with and to support the values and mission of Scripps. The program provides guidance for:

- Policy and procedure development and implementation
- Oversight and monitoring processes
- Education
- Communications
- Ethical business practices
- Corporate integrity and workplace culture

Scripps Information Security Program

Scripps' mission, reputation and daily patient care business operations are directly linked with the management, administration and protection of information systems. The integrity, availability and confidentiality of data and systems have a direct impact on patient care and administrative operations. Scripps' senior management established the Scripps

information security program to focus on HIPAA security regulations as the foundation for an ongoing enterprise-wide information security effort, including the definition and implementation of information security-related policies and ongoing monitoring activities.

Compliance on ScrippsNet

Scripps' Intranet contains a compliance program section, which can be located in the left navigation bar by clicking on "Compliance". Audit & compliance services has developed and maintains this website as a resource for all Scripps staff. The site contains specific information about audit & compliance services, the compliance program, privacy program, and information security program, as well as education materials and other key compliance resource links.

Quality on ScrippsNet

The Scripps Intranet contains a quality section, which can be located in the left navigation bar by clicking on "Quality". Quality data collected and published by Scripps on a variety of quality indicators is available by clicking on quality metrics. The "All Publicly Reported Data" link shows scores on all the information that is externally reported and posted on the internet related to Scripps quality indicator performance.

Scripps Policies & Procedures

While the Standards of Conduct provide the foundational principles for how care is provided and business is conducted, Scripps policies and procedures provide detailed explanations and direction that help to communicate expectations, guide clinical practice, and ensure compliance with state and federal laws and

regulations, licensure requirements and accreditation standards. These policies and procedures have also been developed in accordance with Scripps' Mission and Values. Each policy and procedure is carefully developed to reflect our shared commitment to excellence in all we do. As with the Standards of Conduct, every individual at Scripps is responsible for knowing, understanding and following the policies and procedures that apply to the job they perform, the behaviors they exhibit on the job or the specific task at hand. Policies also provide guidance to leaders and staff on critical compliance issues and are an important element of our corporate compliance program. System-wide policies and procedures including those that are compliance-related, are accessible the on-line Intranet policy library at <http://scrippsnet/policylibrary/>. The on-line policy library is indexed by category and title, and also includes a keyword search capability.



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• PROFESSIONALISM • **ACCOUNTABILITY** • QUALITY • VALUES • INTEGRITY • PATIENT SAFETY
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The Scripps Compliance and Patient Safety Alertline is available toll-free, 24 hours a day,
7 days a week at **1-888-424-2387**. Reports can be made anonymously.