

CODE OF CONDUCT

**The Hospital Authority
Operating as
Nashville General Hospital at Meharry,
Bordeaux Long Term Care
And
The J.B. Knowles Home**

The Hospital Authority is committed to honesty and fairness in all we do. It is very important that every member of the staff communities know about and live up to these values. This Code of Conduct explains the standards of conduct that you must follow as a member of the Metropolitan Nashville General Hospital (NGH), Bordeaux Long Term Care (BLTC) and J. B. Knowles Home (Knowles) communities. If you are an NGH, BLTC or Knowles medical staff member, health professional, affiliated provider, trustee, employee, administrator, manager, contractor, vendor, consultant, agent, representative, or volunteer, then you are a member of our community.

You must understand and follow this Code of Conduct. After you have read the Code of Conduct, we will ask you to sign your written promise to follow it.

MISSION STATEMENTS

Nashville General Hospital at Meharry is a publicly supported, academically affiliated, community-based hospital. We are committed to providing quality healthcare regardless of age, race, creed, gender, sexual preference or ability to pay. With the alliance of Meharry Medical College and Vanderbilt University, we will provide an educational and research environment based on the provision of comprehensive, compassionate, acute care services to those in need. Our employees, physicians, and vendors will be given the same respect, concern, and caring attitude that they are expected to share with our customers.

In order to meet our vision, mission, and values, we will work together to be financially viable while continuously improving our skills and resources through excellence in education and research. Our goal is the achievement of 100% access to healthcare and zero disparity.

Bordeaux Long-Term Care, a division of the Hospital Authority in alliance with Nashville General Hospital, is a publicly supported facility committed to individualized resident care. As a regional leader in the provision of skilled nursing, rehabilitation services, intermediate care and palliative care, we are committed to involving our internal and external communities in providing comprehensive services and activities to our residents without regard to gender, ethnic or racial background, sexual preference or socioeconomic status. Working together with our Meharry Medical College partner, the community and Nashville General Hospital allows for an educational environment for residents and staff to promote creativity, innovation, and clinical excellence. We also strive to improve the skills and ability of our management staff to achieve the highest optimum functioning for our residents. In order to make a positive difference for our residents, employees, physicians and community, exceeding expectations of all will be a way of life at Bordeaux Long-Term Care.

The J.B. Knowles Home, the newest member of the Hospital Authority community, serves the community by providing assisted living and adult day care functions.

Vision: Each staff, faculty member, patient and student would be proud and comfortable to have their loved ones cared for at our facility

Values: Our values will provide the essence of who we are and how we achieve our vision and mission:

- Honesty and Integrity in all we say and do
- Respect and Dignity for all human kind
- Compassion to those we serve and to each other
- Competent, knowledgeable staff motivated to achieve personal and professional growth
- Accountability to society, our community and each other
- Teamwork to achieve our vision, mission, and values

FROM THE HOSPITAL AUTHORITY CEO

Dear Colleague,

Nashville General Hospital, Bordeaux Long Term Care and the J.B. Knowles Home communities, composed of hospital staff members, physicians, allied health professionals, trustees, volunteers, vendors and contractors who work with us, strive to provide quality health care services to our patients, residents and their families. Every day, patients, residents and their families come to us for care. We work with individuals who are experiencing a wide range of emotions – from the excitement and joy of having a new baby to the grief involving the death of a loved one. Trust is one of the most important factors in developing effective relationships with our patients, residents and their families.

Our commitment to integrity is vital as we seek to earn trust from those we serve and from each other. As one method of demonstrating the importance of this commitment, we have adopted a written Code of Conduct that describes the behaviors expected of the NGH, BLTC and Knowles communities. Because the delivery of health care services is complex and the Code of Conduct is a resource for the NGH, BLTC and Knowles communities, the document is somewhat lengthy. However, the Code can be summed up very easily – as members of the NGH, BLTC and Knowles communities, we will simply do the right thing. We intend to follow all applicable laws and regulations and to consistently demonstrate ethical behavior in our business practices.

The Code of Conduct describes four major areas:

- First and foremost, every member of the NGH, BLTC and Knowles communities must provide quality care and protect patient and resident rights
- We must comply with all applicable laws, regulations and promote ethical conduct
- We must avoid conflicts of interest and make decisions that are in the best interest of NGH, BLTC and Knowles and the patients and residents we serve
- We must promote a safe environment for staff physicians, patients and residents.

As a valued member of the NGH, BLTC and Knowles communities, I am asking that you take time to read this Code of Conduct and ask your supervisor or the Compliance Officer (Byrd Crowder at NGH or David Lampley at BLTC and Knowles) if you have questions. Training sessions for staff that will focus on key compliance issues in healthcare and practical examples are scheduled for new employees and annually for staff. Please be sure to attend one of these sessions. Once you have attended the training and read the Code of Conduct, you will be asked to complete the acknowledgement sheet included with the Code of Conduct and return it to Human Resources for your personnel file.

As noted in the Code of Conduct, each member of the NGH, BLTC and Knowles communities is expected to report possible violations of the law, regulations, policy or Code of Conduct. Such reporting provides us the opportunity to correct situations promptly. We can achieve our goal of compliance only if we all work together to identify and resolve potential issues.

I'm so pleased with our progress at the Hospital Authority and am also excited about the opportunities for our future. It is indeed a privilege to work with you to serve our patients and residents. Thank you in advance for the time you will spend reading the Code of Conduct and working together to learn how we can better fulfill our intent to "do the right thing."

Sincerely,



Reginald B. Coopwood, M.D.

Chief Executive Officer

PURPOSE OF THE CODE OF CONDUCT

The purpose of this Code of Conduct is to help make sure that we put our values into action and that we follow all the laws and rules that apply to us. The Code of Conduct is an important part of our overall Compliance Plan, which has been approved by the Hospital Authority of the Metropolitan Government of Nashville Davidson County. Like the Code of Conduct, the Compliance Plan applies to all members of the NGH, BLTC and Knowles communities.

◆ Knowledge about the Compliance Plan and the Code of Conduct

You are expected to know and follow the Code of Conduct and the basic laws and rules relating to your job at NGH, BLTC or Knowles. We want the Code of Conduct to be easy to understand and to be as complete as possible. However, many of the subjects covered are complex, and you may need more guidance or more information depending on your particular work at NGH, BLTC and Knowles. That is why we have some specific training programs and some more detailed compliance policies and procedures for particular areas. Whenever you have a question or whenever you need more information, you should check with a supervisor or call one of the people listed on the back cover of this Code of Conduct.

◆ HIPAA Requirements.

NGH and BLTC recognize the requirements of the Health Insurance Portability and Accountability Act of 1996, ("HIPAA"), including the federal privacy regulations, the federal security standards and the federal standards for electronic transactions, all collectively referred to herein as "HIPAA Requirements". NGH, BLTC and Knowles agree not to use or further disclose any Protected Health Information, other than as permitted by HIPAA Requirements. A copy of the "Privacy Notice", which explains the major points of the Privacy Regulations and the patient/residents rights, is posted at each facility.

◆ Reporting

If you think that a law or rule may have been broken, you must speak up. You should report the situation to your supervisor or to the Compliance Officer, or you can call the Compliance Hotline. NGH, BLTC and Knowles do not share the names of people who make reports on the Hotline unless required to do so by law. No calls are traced. You also may ask for a confidential face-to-face meeting with the Compliance Officer.

On the back cover of this booklet you will find a list of people to contact and how to contact them to report a problem. Every employee has the job of reporting possible problems. Being aware of problems and not reporting them may subject you to discipline, including loss of medical staff membership or employment. If any situation makes you feel uncomfortable, it is important and deserves attention.

◆ No Retaliation

You can report problems without fear of retribution or retaliation. NGH, BLTC and Knowles do not allow retaliation against anyone who, in good faith, reports a possible violation or problem even if no actual problem is found when we investigate the report.

◆ **Monitoring**

We will check, using reviews and audits, to make sure that everyone is following this Code of Conduct and to see how well our Compliance Plan is working.

◆ **Enforcement**

When NGH, BLTC and Knowles learns of a possible problem, it will investigate the situation right away. If we find a violation, we will correct the problem and discipline the people involved in an appropriate and fair way.

BASIC PRINCIPLES

Each member of the NGH, BLTC and Knowles communities must:

- Provide quality care and protect the rights of all patients.
- Follow all laws and rules and be ethical, fair, and honest.
- Avoid conflicts of interest and make decisions that are in the best interest of NGH, BLTC, Knowles and the patients and residents we serve.
- Promote a safe environment for everyone, especially for our patient and residents.

These principles are described in more detail in the sections that follow.

PROVIDING QUALITY CARE AND PROTECTING PATIENT RIGHTS

At NGH, BLTC and Knowles we treat all patients and residents in a way that protects their rights and preserves their dignity, autonomy, and self-esteem. We make sure that patients and residents are involved in all aspects of their care. We give each patient and resident not only quality medical care and caring treatment, but also appropriate confidentiality, privacy, and security. When a patient or resident needs or wants services that we cannot give, we will offer to transfer the patient or resident to a facility that can provide the service.

◆ **Informed Consent**

Consistent with the law, we must give all patients and residents the information they need to make decisions about their treatment and to give their informed consent to treatment. Every patient or resident has the right to be told about the material risks of any proposed treatment, the benefits from the treatment, other treatments available, and the consequences of refusing treatment. The patient's or resident's decision about a particular treatment based on that information ("informed consent") must be written and included in the medical record.

◆ **Authorization for Treatment**

All adult patients and residents must have the opportunity to make decisions about their treatment. A competent adult has a right to make decisions about his or her treatment, even if the result is a serious risk to life or health, or even death. In fact, doctors and other health care providers generally have no duty to check with the patient's or resident's family members in such situations. Moreover, the patient's or resident's right to privacy keeps the doctor or other health care provider from talking about a patient's or resident's case with another person without the patient's or resident's permission.

The situation is different when patients or residents are not able to make their own decisions. This may happen when the patient or resident does not have the mental capacity or is not physically able to make his or her wishes known. In general, if an adult patient or resident is not able to make his or her own health care decisions, another person whom the patient or resident has chosen can make the decisions. If such a person has not been chosen by the patient or resident, the law allows a "surrogate" to act on their behalf. This surrogate is typically the nearest of kin but may be another interested adult. Any concern about the individual making healthcare decisions must be reported to Risk Management or the Compliance Officer.

In general, parents or legal guardians can make health care decisions for their children who are under 18. But in some situations, parents or legal guardians may not refuse life-saving care for their minor children, even on religious grounds. You should check with NGH or BLTC Risk Management when there is any question about consent for the treatment of children under age 18.

You should also contact Risk Management or other appropriate administrative staff, if there are questions about how to get proper authorization for treatment.

◆ **Equal Access to Care**

NGH, BLTC and Knowles provide all patients and residents with equal access to care and do not discriminate because of race, creed, sex, national origin, sexual orientation, disability, ability to pay, or age. Our admission and transfer policies are not based on the patient's or resident's ability to pay or hospital economics.

◆ **Quality of Care**

We must all work together to give our patients and residents quality care.

In general, healthcare facilities are responsible for providing patients and residents with a "reasonable standard of care" which is defined by laws and rules. Each patient or resident at NGH, BLTC and Knowles has the right:

- to be told about his or her rights;
- to be involved in his or her plan of care;
- to make informed decisions regarding that care;
- to formulate advance directives and to have those directives followed;
- to have privacy and to receive care in a safe setting;

- to be free from verbal or physical abuse or harassment;
- to expect confidentiality of his or her medical records and health information;
- to look at and make copies of his or her medical records; and
- to be free from the use of seclusion and restraints as a means of coercion, convenience, or retaliation by staff.

◆ **Patient Care Personnel Credentialing**

All doctors and health professionals at NGH, BLTC and Knowles must be properly credentialed for the patient or resident care they are providing. The credentials must be kept current in the medical staff personnel files.

◆ **Freedom of Choice**

A patient or resident should be free to choose a provider for his or her care after discharge from NGH, BLTC or Knowles. If you are involved in discharge planning or in referring patients or residents to home health agencies, DME suppliers, or long-term care or rehabilitation providers, you should involve the patient or resident in the process and get the consent of the patient or resident (or of the person who is authorized to make such decisions for the patient). The patient or resident may want to talk with his or her insurance company about the different choices. You should give the patient or resident information about all the reasonable choices available under the circumstances. You must act in the best interest of the patient or resident and you must not interfere with the patient's or resident's freedom of choice.

The Hospital Authority recognizes the *Olmstead v. L. C.* Supreme Court decision of 1999 that clearly challenges Federal, state, and local governments to develop more opportunities for individuals with disabilities through more accessible systems of cost-effective community-based services. NGH, BLTC and Knowles work continually to locate such opportunities for any patient or resident prior to discharge from the facility.

◆ **Confidentiality**

Patients and residents have a right of complete confidentiality in health care. NGH, BLTC and Knowles do not allow unauthorized seeking or sharing of information related to a patient's or resident's medical care. Without the express consent of the patient or resident, no health care provider, health services organization, or insurance company may give or get information about the patient or resident. There are some exceptions to this rule. For example, health care information may be shared with the patient or resident or a person who is authorized to make decisions for the patient or resident. Health care information may be shared with the people directly involved in treating the patient or resident or processing payment for treatment, and with people responsible for peer review, utilization review, and quality assurance. And in some situations, the health care provider may be required by law to give a patient's or resident's health care information to the government, for example, if the patient or resident is a victim of abuse or if the patient or resident carries a sexually transmitted disease.

If you have questions regarding a patient's or resident's right to confidentiality, you should ask the Compliance Officer or your supervisor. If you believe that confidential patient or resident information has been given or requested improperly, you should immediately report the problem.

◆ **Billing Information**

Bills for services must be itemized, must have the dates of service, and must give a truthful account of the services that were given and the charges for those services. Patients or residents are told about our billing and payment policies. Their questions about billing and payment must be answered fully, promptly, and courteously.

◆ **Ethics Committee**

There are Ethics Committees at NGH and BLTC. Questions or concerns about ethical issues related to patient or resident care should be referred to the Ethics Committee. Ethical issues are handled confidentially and in a way that protects the rights of everyone involved.

◆ **Participation in Research Studies**

NGH and BLTC follow all laws and rules for research involving human beings. Before beginning research using human beings, a NGH or BLTC researcher must get approval from the Meharry Medical College Institutional Review Board. The Medical Executive Committee is responsible for protecting the rights and welfare of the human beings who are used in the research studies conducted at NGH or BLTC. Research studies recommended by the Meharry IRB are approved by the Medical Executive Committee and the Hospital Authority Board of Trustees prior to commencing.

FOLLOWING FEDERAL, STATE, AND LOCAL LAWS, REGULATIONS, RULES, AND ACCREDITATION STANDARDS

◆ **"Fraud and Abuse" laws and regulations**

All members of the NGH, BLTC and Knowles communities are expected to guard against fraud and abuse. Although the "Fraud and Abuse" laws are complex, you should know their basic provisions. These laws are explained in general terms below.

NGH, BLTC and Knowles comply with all "Fraud and Abuse" laws and regulations. The "Fraud and Abuse" laws are designed to prevent fraud in health care programs and abuse and waste of the public money used to fund the programs.

◆ **Referrals to Entities with Which a Doctor Has a Financial Relationship**

The Stark Bill broadly states that a doctor may not refer patients for certain services to organizations -- like NGH or BLTC -- if the doctor, or the doctor's immediate family members,

have a financial relationship with that organization. The purpose of the law is to make sure that doctors and hospitals do not order unnecessary medical expenditures. There are certain exceptions to the Stark Bill. Any financial relationship between NGH or BLTC and a referring doctor must fit within one of the exceptions. NGH and BLTC will study business arrangements with doctors who refer patients to be sure the law is followed.

◆ **Anti-Kickback and Self-Referral Policies**

It is against the law to give or take “kickbacks.” Kickbacks include offering, paying, asking, or accepting any money or other benefit in exchange for patient referrals, purchases, leases, or orders. NGH, BLTC and Knowles follow this law strictly. We do not pay for referrals and we do not take payment for referrals that we make. To help make sure that no one connected with NGH, BLTC or Knowles takes or gives a kickback, we have the following policies in place:

- No money, gift, discount, rebate, loan, service, or gratuity of any kind should be offered, given, or taken in exchange for, or to encourage, the referral of patients or residents to NGH, BLTC or Knowles.
- All contracts and other arrangements with referral sources must follow all laws that apply.
- Any doctor who gets a payment of any kind from NGH, BLTC or Knowles must keep records of the time, date, and type of services provided and must submit those records before receiving payment.
- Agreements with providers must be in writing and be approved by NGH, BLTC or Knowles administration. All payments to doctors or other sources of referrals must be at fair market value and may not take into account the volume or value of referrals to NGH, BLTC or Knowles.

◆ **False Claims – Cost Report Issues**

NGH and BLTC community members who, as part of their jobs, deal with developing or submitting a cost report to Medicare must follow applicable laws, regulations, and guidelines regarding cost reports. To help NGH and BLTC make accurate hospital cost reports, you should carefully follow NGH and BLTC policies on keeping expense records.

◆ **Medical Necessity**

No claims for payment for services may be submitted unless the services were “medically necessary” and were ordered by a doctor or appropriate person. The Compliance Officer and other departmental managers will provide information to the appropriate NGH, BLTC or Knowles community members about the “medical necessity” definitions and rules of the different government and private insurance plans with which we deal. NGH, BLTC and Knowles require their medical staffs to document the medical need for each test or service by giving an appropriate diagnosis or diagnosis code for the patient. Failure to follow these requirements may result in serious consequences, including termination of employment or medical staff membership or even criminal punishment.

◆ **Custom Service Profiles**

NGH and BLTC do not provide custom profiles for laboratory tests.

◆ **Billing**

NGH and BLTC bill only when hospital and professional services have been provided and properly documented. All members of the NGH and BLTC communities who work with billing or claims must carefully follow applicable rules for billing. It is against the law to make or submit a false or fraudulent claim for payment to the government or a private insurance company. False claims include billing for services not rendered or improperly documented, up coding, misbundling, submitting inaccurate diagnostic information, and misrepresenting the medical necessity of services provided. If you know or believe that a bill is false or incorrect, report the problem immediately to the Compliance Officer.

Reporting Fraud and Abuse Problems. You should report Fraud and Abuse violations and problems to the Compliance Officer. Check with the Compliance Officer if there are any questions about business arrangements that NGH or BLTC might have with doctors, home health agencies, nursing homes, equipment companies, pharmaceutical companies, or other providers for whose services the government may be billed.

◆ **Emergency Treatment for Patients and Women in Labor and Patient Transfers (EMTALA)**

NGH and BLTC follow the laws and rules about the evaluation, admission, and treatment of patients with emergency medical conditions and pregnant women who are in labor.

◆ **Compliance with Antitrust Laws**

NGH, BLTC and Knowles follow all state and federal antitrust laws and regulations. The antitrust laws protect the free market and promote fair competition. They generally do not allow monopolization or other kinds of restraint of trade or unfair competition. In particular, the antitrust laws do not allow competitors to get together to set prices or divide markets or to refuse to deal with someone. You should avoid communications with our competitors about things that might interfere with free and fair competition. This includes any communication with competitors about fees, charges for services, discounts, terms of vendor relationships, salaries, or anything else having to do with price, volume of services, or business allocation. You may not agree with a competitor to refuse to deal with a vendor.

◆ **Tax Requirements**

NGH, BLTC and Knowles are tax-exempt entities. NGH, BLTC and Knowles want to be true to their charitable mission and want to keep their tax-exempt status. To do this, we must be especially careful to prevent "private inurement." Private inurement may occur when a person who has a special relationship of influence with NGH, BLTC or Knowles – like a trustee, or an officer, or certain doctors – get NGH, BLTC or Knowles assets without providing equally valuable services to NGH, BLTC or Knowles. As a general rule, none of the income or assets of NGH, BLTC or Knowles may benefit any NGH, BLTC or Knowles member, officer, or other facility "insider." This rule does not prevent NGH, BLTC or Knowles from making reasonable payments for the goods and services that they get.

◆ **Compliance with Medical Records Requirements**

All records and materials must be made and kept as required by law.

The law requires NGH, BLTC and Knowles to prepare and keep certain medical records. All records must be prepared accurately and honestly. Entries to a patient's or resident's medical record should be made at the time that the service is given and must be dated when made. If an entry cannot be made at the time of the service, it should be noted as a late entry. If you are concerned about any entry in a medical record you are free to discuss that concern with your supervisor or the Compliance Officer.

◆ **Human Resources Policies**

NGH, BLTC and Knowles follow all federal, state, and local labor laws and rules. These laws include, for example, the Family and Medical Leave Act, the Fair Labor Standards Act, anti-discrimination laws, hostile work environment and other laws and rules that protect our employees. Employees are welcome to express any concern about their workplace to the Human Resources department. To help make sure that we comply with the law, we have set up certain Human Resources policies that everyone must follow.

◆ **Marketing Policies**

NGH, BLTC and Knowles will act ethically in all its marketing activities. Our marketing materials will reflect our mission and values. They will accurately describe our services and the level of our licensure and accreditation.

◆ **Cooperation With Investigations**

NGH, BLTC and Knowles must cooperate with government investigations. If an NGH, BLTC or Knowles employee receives a subpoena, search warrant, or other similar document, the employee should immediately call the Compliance Officer or Chief Operating Officer before taking any action. If a government investigator, agent, or auditor comes to NGH, BLTC or Knowles, you should immediately check with a supervisor, the Compliance Officer, or Chief Operating Officer before you talk to the government official about anything or give any documents to the government official. The Compliance Officer or designee will handle the release and copying of documents.

CONFLICTS OF INTEREST

NGH, BLTC and Knowles medical staffs and employees are expected to be loyal to and must avoid doing things that conflict with the interests of the Hospital Authority or with the interests of our patients or residents.

You may have a conflict of interest if you have a personal financial interest that influences or appears to influence your ability to make objective decisions in your job. You may have a conflict of interest if you are not able to give the time or attention needed to do your job at NGH, BLTC or Knowles or if you use NGH, BLTC or Knowles resources for purposes that are not related to NGH, BLTC or Knowles business.

You should avoid any financial interests that conflict with the interests of NGH, BLTC or Knowles and the Metropolitan Government. This means, for example, that neither you nor any of your relatives should interfere with a business opportunity that belongs to NGH, BLTC or Knowles. Similarly, you should not have a financial relationship with any competitors or suppliers of NGH, BLTC or Knowles.

These are just a few examples of conflict of interest situations. The NGH, BLTC and Knowles Conflict of Interest Policy is explained in more detail in the Bylaws of the Hospital Authority and the documents that are mentioned in that Policy. You are expected to follow the Hospital Authority Conflict of Interest Policy. If you have any questions about a possible conflict of interest, you should check with the appropriate supervisor or the Compliance Officer. Whenever there may be even the appearance of a conflict, you must get permission from the appropriate supervisor before you go ahead with the activity. A conflict of interest may also be an illegal kickback.

When a conflict of interest is discovered, it must be reported to the Compliance Officer, and it must be corrected.

◆ **Receiving Business Courtesies**

You may not ask for or take, directly or indirectly, for yourself or anybody in your household, any gift, gratuity, service, favor, entertainment, lodging, transportation, loan, loan guarantee, or other thing of monetary value from anyone who has or is seeking a business relationship with NGH, BLTC or Knowles. There are a few exceptions. For example, it is okay to eat refreshments that are served at a community event associated with NGH, BLTC or Knowles. Other examples are explained in Metro Executive Order 91-08 or its revisions.

◆ **Extending Business Courtesies**

When NGH, BLTC or Knowles sponsors an event for a business purpose, NGH, BLTC or Knowles may offer reasonable and appropriate meals and entertainment. However, these meals and entertainment, like all parts of NGH's, BLTC's or Knowle's business events must follow Metro Government and Hospital Authority policy.

PROMOTING A SAFE ENVIROMENT

◆ **Compliance with Environmental Safety Laws**

NGH, BLTC and Knowles must follow all the laws and rules for disposing of all waste, especially hazardous and medical waste.

◆ **Compliance with Health and Safety Requirements**

The NGH, BLTC and Knowles communities must follow all laws, rules, and facility policies and procedures that protect health and safety. You should know and understand the laws, rules, and policies for your job and work area. If you have questions, you should ask your supervisor. Promptly tell the appropriate supervisor or Employee Health Services of any on-the-job injury.

Tell the Director of Compliance and Regulations if you notice any dangers or unsafe conditions so that we can correct the problem.

◆ **Controlled Substances**

Authorized employees and doctors routinely handle prescription drugs, medical supplies, and other controlled substances. Improper use of these substances is illegal and very dangerous. NGH, BLTC and Knowles strictly follow all laws and rules about controlled substances. If you know or believe that any controlled substance has been removed from the hospital or has been handled, given, or taken without proper authorization, you must immediately tell a supervisor, the Chief Nursing Officer or Director of Nursing, or the Human Resources Director.

◆ **Substance Abuse and Mental Acuity**

To protect the entire Hospital Authority community as well as our patients, residents and visitors, NGH, BLTC and Knowles have an Alcohol and Drug-Free Workplace policy. It is against NGH, BLTC and Knowles policy to come to work under the influence of alcohol or any illegal drugs, or to have an illegal drug in your system, or to use, possess, make, distribute, or sell illegal drugs on NGH, BLTC and Knowles work time or property. Employees who appear to be "under the influence" may be subject to drug testing. Violations of the policy may result in disciplinary action, up to and including loss of employment or medical staff membership. You should immediately tell your supervisor or the Compliance Officer about any problems related to drug or alcohol use at work.

If you are taking prescription drugs that may impair your judgment or job skills, you must tell your supervisor or the Human Resources Department.

◆ **Tobacco**

NGH, BLTC and Knowles strive to have smoke-free environments. Smoking is not allowed inside any Hospital Authority facility. Smoking is allowed only in special smoking areas on the grounds.

REPORTING VIOLATIONS AND PROBLEMS

1. If you are aware of any possible violation of this Code of Conduct or any other part of the Compliance Plan, you must report the problem. If you have questions, please ask your supervisor or the Compliance Officer. The information you give us will be shared with others only on a need-to-know basis as required by law.
2. NGH, BLTC and Knowles do not allow retaliation against anyone who, in good faith, reports a possible problem or violation.
3. Your questions and concerns are very important. They give us opportunities to work together to improve the services we provide to our community.
4. On the back cover of this booklet you will find a list of people to call if you need to report problems or violations, or when you have questions or concerns.

This Code of Conduct is designed to protect you and the entire NGH, BLTC and Knowles communities as well as our patients, residents and visitors. It is your guide to doing the right thing. Do not hesitate to talk with your supervisor or with one of the people listed below if you have any questions or concerns. The Compliance Officer is always available to help you. Here is the list of people you should call to tell us about your concerns, to report a problem, or to talk about your questions.

LIST OF CONTACTS FOR COMPLIANCE INFORMATION, QUESTIONS, AND TO REPORT VIOLATIONS OR PROBLEMS OR FOR QUESTIONS RELATED TO ACCREDITATION, LICENSURE AND RISK MANAGEMENT

Nashville General Hospital at Meharry

Lee Holmes, Compliance Officer:

Office (615) 341-4577

E-mail: lee.holmes@nashvilleha.org

Compliance Hot Line – (615) 341-4555

Bordeaux Long Term Care and J.B. Knowles Home

Tiffani Reed, Director of Quality, Advocacy & Risk Management:

Office (615) 862-7024

E-mail: tiffani.reed@nashvilleha.org

Compliance Hot Line – (615) 862-4399