

Code of Conduct *and* Integrity Program

There is a reason
we are here together.



Fred Hutch · Seattle Children's · UW Medicine



We are all committed to keeping our patients **at the center of what we do** and advancing the standards of cancer care every day.

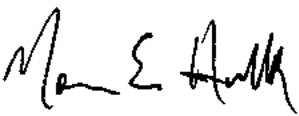
Our commitment binds us as colleagues and unites us in purpose. We all understand that health care is a constantly evolving, highly complex, and heavily regulated industry. Seattle Cancer Care Alliance (SCCA) provides programs that support the organization and its workforce through this labyrinth as we lead the world in translating scientific discovery into the prevention, diagnosis, treatment, and cure of cancer.

Integrity must exist at the core of our corporate culture if we are to achieve our goals. We have a long history of demonstrating integrity. The practice of behaving honestly, ethically, and legally is an individual responsibility. In many situations, doing so is easy and requires little thought. Often, the framework for making

the right choice is easily accessible and readily evident. When the situation is more challenging or vague, this code and its content should serve as a reference point that assists you in continuing to work with Integrity.

If we find ourselves questioning whether a response or action adheres to our own standards or those set by SCCA, it is up to each of us to seek help. Each of us has a personal responsibility to speak up, to voice our concerns, or just ask questions. If guidance is needed, please speak directly with your manager, executive leadership, or the Integrity Program for assistance.

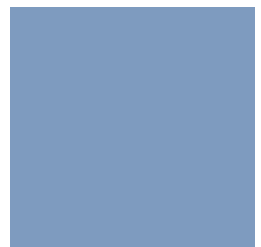
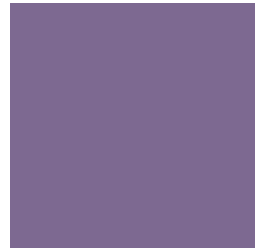
The standards contained in this code apply to all SCCA workforce as well as members of our corporate Board of Directors.



Norm Hubbard
Executive Vice President



Traci Pranzini
Corporate
Integrity Officer

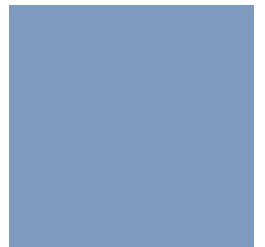
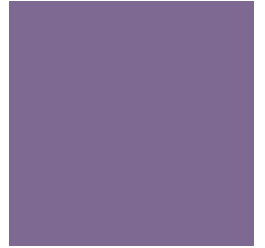
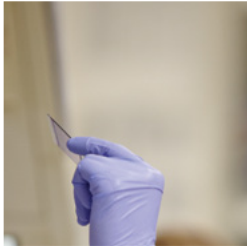


Together
we are better.



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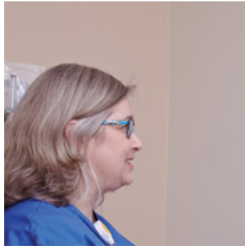
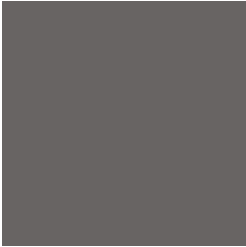


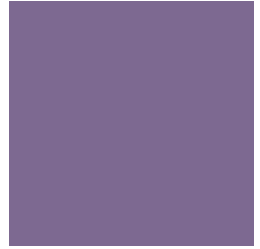
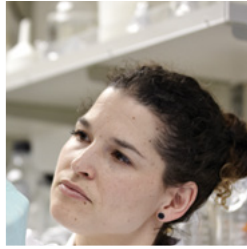
Mission

We act with a **sense of purpose**, a **clear vision**, and **strong values**.

Each of us has a unique role to play in ensuring SCCA will honor its commitments:

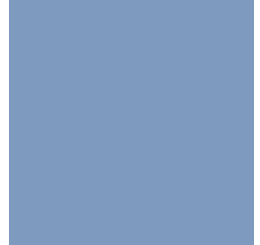
- To provide state-of-the-art, patient- and family -centered care
- To support the conduct of cancer clinical research and education
- To enhance access to improved cancer interventions and advance the standard of cancer care, regionally and beyond





Vision

If each of us does our part in advancing this purpose, we ensure SCCA's vision is achievable:



Lead the world in translating scientific discovery into the **prevention, diagnosis, treatment, and cure of cancer.**

Our collective success hinges on each of a set of values—operating principles—in

We are
patient-
centered

Everything we do must be linked to our ability to deliver better, safer outcomes for our patients. Nothing is more important, and any choice that could lead us astray from that focus is no choice at all. We approach everything we do with compassion, conviction, and a constant striving because we know how profoundly important our work is to the lives of the patients we serve.

We are
innovative

The existence of SCCA is the result of a truly innovative approach to fighting cancer. Each of us—regardless of the role we play—is here because we have the chance to push the boundaries of conventional wisdom in that fight. We will nurture an environment that fosters unconventional thinking, a passion for discovery, and the open-mindedness to invite discovery from unexpected places.

We are
respectful

Our diverse range of backgrounds, perspectives, and experiences offers us the ability to meet the widely varied needs of the community of patients we serve. Each person and every job at SCCA plays a role in the safety and care of our patients. We are deeply respectful of our patients, their families, and each of our colleagues who serve them in so many different and important ways.

us conducting ourselves in accord with everything we do. **Together.**

Our ability to be better together hinges on cultivating a culture of teamwork that is not only unusual, but unprecedented. Not just among the many different people of SCCA, but with our patients and caregivers as well. We understand that asking for and offering help in how to do better is not just a right, but among our most important responsibilities.

We are collaborative

We cannot just be comfortable with change; we must embrace it as proof that we are making progress. The speed of our progress is entirely linked to how well we integrate new insights into our research, our teaching, and our clinical work. We will be known for our ability to adopt new approaches and practices, because our patients come to us for the most advanced care available.

We are agile

Our work affects many dimensions of our patients' lives. While our focus is on their health and safety, we are conscious of the impact cancer care can have on people's emotional well-being, financial security, and the environment we all share. Because our work is centered on people's well-being, we approach it with the highest level of ethical, fiduciary, and environmental responsibility.

We are responsible

Patient Care

Culture of Safety

At SCCA, we are committed to creating a caring and healthy environment for everyone—including all workforce members. To that end, the workforce is expected to treat each other and our patients in a fair and respectful manner.

Safety, quality of patient care and research, and the retention of our most valuable resource—our people—are dependent on SCCA's ability to foster teamwork, maintain open lines of communication, and cultivate a positive, collaborative work environment.

Behavior that Undermines a Culture of Safety

Behavior that undermines a culture of safety is unprofessional and unacceptable at SCCA. Such behaviors create an unhealthy or even hostile work environment, as well as:

- Undermine team effectiveness;
- Increase medical errors and/or preventable adverse outcomes;
- Decrease patient satisfaction;
- Add to the cost of care; and
- Cause qualified workforce to seek new positions.

Examples include, but are not limited to:

- Overt actions, such as verbal outbursts and physical threats;
- Passive activities, such as not performing assigned tasks or quietly exhibiting uncooperative attitudes during routine activities;

Agile

Patient-centered

- Reluctance or refusal to answer questions, return phone calls, or respond to pages;
- Condescending language or voice intonation;
- Impatience with questions or discussions; and
- Retaliation against those who report intimidating and/or disruptive behaviors.

Behavior that undermines a culture of safety sometimes goes unreported and therefore unaddressed. Workforce may be hesitant to report such behaviors because of:

- Uncertainty whether the behavior would be considered disruptive;
- Fear of retaliation or distress over reporting on a colleague; or
- A lack of awareness of exactly how to report.

Speak Up for Patient Safety

Any workforce member who observes or becomes aware of a potential risk to patient safety has the authority and responsibility to speak up and request the process be stopped in order to clarify the patient safety situation. If a workforce member believes that he/she has been subjected to any retaliation for raising patient safety concerns, that person should report such suspected retaliation to Quality and Patient Safety at (206) 288-2129 or the Patient Safety mailbox at ptsafety@seattlecca.org so that it may be investigated.

At SCCA, we believe
that **world-class care**
can only happen with
world-class service.

We embrace every opportunity to connect with our patients and anticipate their needs. By responding proactively, we provide the hope, compassion, dignity, and respect they deserve.



C

ommunication

We explain our role, what we're doing, and why we're doing it

We return calls and emails promptly

We inform patients of expected wait times

We ask if patients have any questions or concerns

A

ttentiveness

We introduce ourselves, smile, and make eye contact

We display our names professionally at collar level

We escort our patients to their destination when needed

We continue helping patients until their needs are met

R

elationships

We speak positively of colleagues

We acknowledge others' ideas and collaborate
across departments

We recognize that our common goal is to serve patients

We work as a team to maintain a safe and clean environment

E

mpathy

We show respect for our patients' feelings

We acknowledge individual preferences

We demonstrate caring through simple gestures
of kindness

We consider how our actions impact patients

We apologize when things go wrong

Integrity Principles

The SCCA is committed to the highest standards of legal and ethical business conduct, including full compliance with all applicable laws, rules, and guidelines. Our workforce is required to conduct themselves in accordance with the following Integrity Principles:

Principle One

Maintain a working knowledge of, and follow, all laws, rules, policies, procedures, and ethical guidelines that affect daily work.

Principle Two

Provide a safe, respectful, and compliant environment for SCCA patients and workforce.

Principle Three

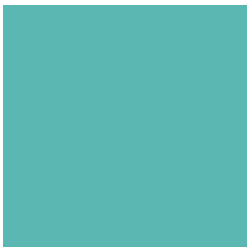
Maintain SCCA's confidential, proprietary, and protected information in a manner that adheres to all applicable laws, rules, guidelines, and document retention requirements.

Principle Four

Refrain from (a) soliciting or accepting gifts, favors, benefits, services, or items of value in return for preferential treatment or patient referrals; and (b) offering or paying to anyone gifts, favors, benefits, services, or items of value in return for patient referrals.

Principle Five

Document and accurately bill for services provided in a manner consistent with all applicable laws, regulations, rules, and contractual obligations.



Principle Six

Refrain from using SCCA resources, including time, funds, equipment, or other resources, in a wasteful manner, for personal benefit or gain, to harm another person, for political activity, or for illegal activity.

Principle Seven

Act with honesty and good faith in all matters and refrain from engaging in inappropriate behavior.

Principle Eight

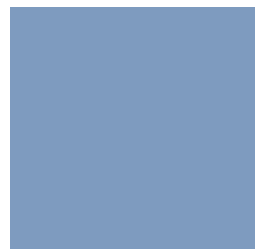
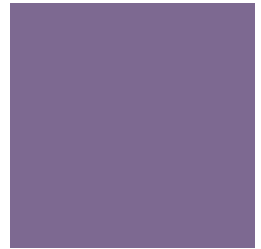
Refrain from engaging in activities or entering into agreements that could, or could reasonably appear to, interfere with responsibilities to SCCA, require or induce disclosure of confidential information, or impair independent judgment.

Principle Nine

Conduct all human subjects research in a manner consistent with applicable legal, ethical, and professional requirements and SCCA policies and procedures.

Principle Ten

All workforce members are responsible for reporting suspected violations.



Corporate Integrity Program Overview

SCCA is committed to the highest standards of legal and ethical business conduct.

The SCCA Board of Directors has delegated responsibility to the Corporate Integrity (Integrity) Program to provide workforce with the guidance and information necessary to fulfill this commitment. The Integrity Program is a comprehensive compliance program developed in accordance with federal guidance and is designed to continually monitor high-risk areas and ever-changing federal and state statutes, regulations, and health care program requirements. Our program is based on the elements of an effective compliance program identified by the U.S. Sentencing Commission and the U. S. Department of Health and Human Services Office of Inspector General to include:

- Designating an Integrity officer and Integrity committees;
- Developing written Integrity plans, policies, and standards of conduct;
- Monitoring and auditing Integrity risk areas;
- Developing open lines of communication, including hotlines and other forms of communication;
- Conducting appropriate training and education;
- Enforcing disciplinary standards;
- Responding to detected deficiencies; and
- Conducting periodic compliance risk assessments.

The SCCA Code of Conduct represents SCCA's standards and rules of ethical business conduct.

This gives SCCA a mechanism for communicating standards of ethical conduct to its workforce, outside businesses, and the general public.

Responsible

The Program consists of the Corporate Integrity Officer, the Associate Director of Corporate Integrity, staff with requisite content expertise, the Board Integrity Committee, and other compliance committees. The Integrity Program addresses general compliance issues related to:

- Conflicts of interest
- Research
- Billing and reimbursement
- Privacy
- Information security
- Business ethics

In addition, the Integrity Program responds to reported compliance concerns and issues identified through ongoing monitoring and auditing activities. The Integrity Program maintains a hotline, which can be accessed through the phone or a website (see below), where workforce may confidentially report compliance concerns. Such requests may be made anonymously. Should the reporter so desire, Integrity staff are able to communicate with the anonymous reporter through the third party call center or website (depending upon how the report was originally made). In order to maintain SCCA's culture of compliance and achieve its Mission, the Integrity Program provides all workforce with regularly scheduled and specifically requested trainings on state and federal legal and regulatory matters, as well as organizational policies and procedures.

Contact Information

Integrity Officer: (206) 288-6640

Integrity Department: (206) 288-1053

Integrity Hotline: (866) 353-6098 or
www.seattlecca.ethicspoint.com

Professionalism

Ethics

When people behave with integrity, they act honestly, sincerely, ethically, morally, and legally. SCCA's policy is to prevent unethical or unlawful behavior, to halt such behavior as soon as possible after its discovery, and to discipline workforce who violate the standards in this code. All SCCA workforce must comply with the Code of Conduct, seek clarification when questions or issues arise, and assist Integrity in investigating any allegations of wrongdoing. SCCA's Code of Conduct cannot cover all circumstances or anticipate every situation. Consequently, workforce encountering situations not addressed specifically by this code should apply the overall philosophy and concepts of this code to the situation, along with the ethical standards observed by honorable people everywhere. If questions arise, contact the Integrity Program for guidance.

All workforce, business partners, and the public must understand that SCCA cares how results are obtained, not just that they are obtained. Workforce is encouraged to openly discuss issues with management, to record transactions accurately in books and records (including medical records), and to be honest and forthcoming with internal/external auditors. SCCA expects honesty in all aspects of every workforce member's work—patient care, records, bookkeeping, budget proposals, economic evaluation of projects, etc.

Respectful

Conflicts of Interest

SCCA workforce must avoid situations in which their personal interests could conflict, or reasonably appear to conflict, with the interests of SCCA.

A conflict of interest may occur if outside activities or personal interests influence, or appear to influence, job performance or decisions made in the course of performing job responsibilities. It is the responsibility of SCCA workforce to be free from conflicts when performing work duties.

Many situations may give rise to a conflict of interest. The existence of a conflict of interest, however, does not mean that the outside activity or relationship must cease. In many cases, steps may be taken to ensure the conflict does not impact work completed on behalf of SCCA. If outside activities might lead to a conflict of interest, talk to a supervisor or the Integrity Program first.



Gifts

SCCA workforce should refrain from giving any gifts, gratuities, or other items of value (collectively referred to as “gifts”) to patients if such gifts will likely influence the patient to seek or continue to seek health care services from SCCA. Offering gifts to patients could be a violation of federal and state laws. Therefore, only inexpensive gifts (i.e., gifts with a retail value of no more than \$10 individually and no more than \$50 annually per patient) may be given to patients. In addition, SCCA workforce may not transfer gifts of cash or cash equivalents (gift cards, cashier’s checks, etc.) to such patients.

SCCA and its workforce must also refrain from giving gifts to anyone in exchange for patient referrals. SCCA may accept a referral from a physician or other health professional as long as the referral is not in exchange for a gift or payment of any kind. In addition, payments or non-cash benefits to physicians, health professionals, or others providing services to SCCA must comply with federal and state regulations.

Unsolicited non-monetary gifts from patients, their friends, and/or family members are permitted so long as they are not given to influence care or secure preferential treatment. Staff must not accept gifts that exceed \$50 in value. An unsolicited non-cash gift valued at \$50 or less is permissible without management approval. Gifts that exceed the value limit must be reviewed and approved by a manager prior to acceptance. Each instance will be judged based on its particular facts. Cash or cash equivalents (gift cards, cashier’s checks, etc.) may never be accepted, regardless of value. Generally, non-cash gifts valued at less than \$50 may be accepted unless the workforce member has any reason to believe that the gift is being offered to influence them or any decisions they make. Food and beverages provided by commercial entities are not permitted at SCCA or at off-site events held by SCCA.

Social Media

Social media websites like Facebook, LinkedIn, Twitter, and YouTube provide people with many opportunities to connect with friends, family, and colleagues. Although social media is personal in nature, it is not private. Personal communications, such as posts or tweets, might be seen by people the author did not intend to share them with. SCCA workforce has a responsibility to be professional at work and online.

- Think before posting. If the author wouldn't want their family or boss to see it, don't post it.
- Many social media sites give users some control over who can see posts and it's a good idea to take advantage of it.
- Portray an honest social identity. Protect patient privacy. In order to protect the privacy of our patients, workforce must never post information about patients on social networking sites without authorization from Marketing or the Integrity Office.

Technology and social media can create complex privacy issues. Because of that, workforce must be extremely careful about online behavior.

Privacy, Confidentiality, & Security

At SCCA, we are committed to safeguarding the **privacy of our patients**. Therefore, the appropriate protection of private and confidential information is paramount.

Patient Information

Maintaining the confidentiality of Protected Health Information (PHI) is essential. All individually identifiable health information held or transmitted by a covered entity (e.g., SCCA) or its business associate, in any form or media, whether electronic, paper, or verbal, is protected by law and called PHI. “Individually identifiable health information” is information, including demographic data, that relates to:

- The individual’s past, present, or future physical or mental health or condition;
- The provision of health care to the individual;
- The past, present, or future payment for the provision of health care to the individual.

All uses and disclosures of PHI must be made with respect for, and sensitivity to, our patients and the law. The most sensitive aspects of a patient’s life may be documented in the medical record; understandably, this makes privacy, confidentiality, and security of PHI a priority for SCCA. Therefore, it is critical that all workforce understand their role in maintaining the confidentiality of PHI.

Innovative

Responsible

Uses & Disclosures of PHI

Privacy laws require that PHI only be used and/or disclosed when the patient has given a written authorization or when it is permitted by law, such as for treatment, payment, or health care operations. A central tenet of current privacy law is the principle of “minimum necessary.” Workforce members must make reasonable efforts to use, disclose, and request only the minimum amount of PHI needed to accomplish the intended purpose of the use, disclosure, or request.



Examples of impermissible uses and disclosures include, but are not limited to:

- Accessing a coworker’s medical record to determine their diagnosis;
- Using the medical record, or any other information system, to find a friend’s contact information (e.g., home address or telephone number);
- Disclosing PHI about a patient (celebrity or non-celebrity) to media outlets, or anyone else, without authorization from the patient; or
- Using PHI in the medical record or any other SCCA database for research purposes without patient authorization and/or Institutional Review Board approval.



IT Systems, Email, & Encryption

Workforce must exercise certain precautions when electronically storing or transmitting PHI. Patient data should only be stored on SCCA applications and systems. Personal cloud storage technologies (e.g., Dropbox) and personal email accounts (e.g., Gmail) should not be used when working with PHI. When using email to send PHI, workforce must encrypt in accordance with SCCA policy by adding **“secure”** in the subject line of the email. The only exception is when sending PHI to our partner institutions.

Any mobile media device used to store PHI, including (but not limited to) laptops and flash drives, must be encrypted. Phones issued by SCCA are already encrypted, and encrypted flash drives may be obtained from Information Technology’s Service Desk. For more information about safeguarding mobile media, please contact the Information Security Office at (206) 288-7006.

Breach Discovery & Notification

Generally any unauthorized access, use, or disclosure that compromises the security or privacy of the PHI would constitute a breach. It is critical that any known or suspected breach be immediately reported to the Integrity Program directly or through the Hotline at (866) 353-6098.

Pursuant to federal and state law, SCCA may be required to notify any individual whose PHI is breached. Notice to the individual must be given without unreasonable delay and in any case no later than 60 days from the discovery date of the breach.



Business Associates

Federal law requires SCCA to enter into a Business Associate Agreement with any person/entity that creates, receives, maintains, or transmits PHI on behalf of SCCA.

SCCA must enter into a Business Associate Agreement prior to contracting with a vendor or purchasing any services from an entity/person who qualifies as a “Business Associate.” The Integrity Program can answer questions about whether a potential vendor/service is a “Business Associate” and provide Business Associate Agreements.

SCCA's Information

Workforce must safeguard SCCA's confidential and proprietary information and trade secrets. This includes information that is not generally disclosed to the public or information that could be useful to SCCA's competitors. Examples include, but are not limited to:

- Financial data
- Planned new projects
- Expansion plans
- Wage and salary data
- Workforce information
- Quality data
- Patient comments, complaints, and statistical data

Documentation & Billing

Accurate Documentation

Documentation of medical and business records at SCCA should be consistent with our Values and Integrity Principles. Documentation that is accurate, complete, and timely is an integral part of the practice of medicine and demonstrates SCCA's commitment to high-quality patient care in a manner that maintains the valued trust of our patients and our colleagues.

Complete and accurate documentation:

- Supports a diagnosis or justifies treatment;
- Improves continuity of care by providing other physicians or nurses with the information they need;
- Ensures that patients receive high-quality care and assists in organizational quality initiatives;
- Protects providers and the organization from medical malpractice liability; and
- Supports appropriate payment for services performed.

Collaborative

Responsible

Billing Practices

SCCA has developed policies and procedures regarding billing practices that are consistent with our values and comply with applicable federal and/or state laws and private payer requirements. In addition, these policies and procedures require each patient's billing claim to completely and accurately reflect the health care services provided, as documented in the medical record.



Examples of unacceptable billing practices include, but are not limited to:

- Billing for items or services not accurately documented in the medical record;
- Billing for items or services that were not actually rendered;
- Billing for items or services not appropriately ordered;
- Billing for items or services that were not medically necessary;
- Billing for items or services rendered without the appropriate supervision;
- Unbundling procedure codes;
- Submitting duplicate bills; and
- Filing false or inaccurate cost reports.

SCCA devotes many resources to preventing and correcting billing errors to Medicare, Medicaid, and other payers. The federal government and many states have enacted False Claims Act laws to pursue billing fraud, waste, and abuse. The False Claims Act is a federal law that prohibits knowingly submitting a false claim for reimbursement. Violating the False Claims Act can cost SCCA a lot of money. Penalties may include damages up to three times the amount paid and fines.

If a workforce member believes any documentation and/or billing practice is inconsistent with SCCA's policies and procedures or the law, they should discuss the issue with their supervisor or contact the Integrity Program.

Improper documentation or billing practices may be considered fraudulent activities resulting in disciplinary action for those committing such behaviors. Disciplinary action may also be imposed against individuals who have knowledge of improper documentation or billing practices and who remain silent or fail to report such behavior. Workforce who report in good faith will be protected from retaliation.

Clinical Research Billing

It is the policy of SCCA that research-related items and/or services provided to human subjects research participants are accurately billed in compliance with all relevant laws, rules, and guidelines. Billing for services provided to human subjects research participants can be very complex, since both the sponsor and the participant may be responsible for various costs associated with the study. When the sponsor provides funding for items and/or services, these items and/or services may not be billed to the human subjects research participant or the participant's insurance carrier. Knowingly submitting bills for items and/or services paid for by the sponsor constitutes fraud and can result in criminal and/or civil penalties under federal and state law.

SCCA workforce involved in human subjects research is responsible for ensuring that clinical-research-related billing is:

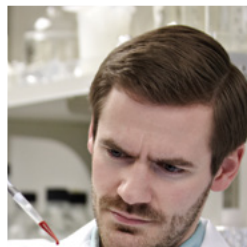
- Based on actual services rendered;
- Allowable by law;
- Consistent with the informed consent document signed by the human subjects research participant;
- Directed to the appropriate party.

Research Compliance

Research is key to achieving SCCA's mission and is driven by our Values of being innovative and agile. In pursuit of its mission, SCCA is committed to supporting University of Washington/Fred Hutch Cancer Consortium research priorities by providing safe and compliant sites of practice for clinical research. It is imperative that workforce members engaged in research:

- Understand the principles and laws that govern human subjects research.
- Maintain a working knowledge of SCCA's research-related policies and procedures.
- Conduct research in compliance with applicable laws, SCCA policies and procedures, and other governing documents.
- Notify the Corporate Integrity Officer of any suspected or discovered violations of research-related laws, rules, guidelines, or organizational policies.

Innovative



Agile



Human Subjects Research

Human subjects research is defined as any of the following: (a) research that involves a living individual about whom an investigator conducting research obtains (i) data through intervention or interaction with the individual, or (ii) identifiable private information; (b) research that involves the use or disclosure of Protected Health Information; (c) an experiment involving one or more human subjects, in which a drug is administered, dispensed, or used; or (d) a clinical investigation or research that involves one or more human subjects to determine the safety or effectiveness of a device.

The U.S. Department of Health and Human Services exercises authority over human subjects research and SCCA has signed an assurance statement committing our organization to compliance with applicable regulations. To ensure that human subjects research at SCCA is conducted in an ethical manner and in compliance with the law, SCCA has a Human Research Protection Plan in place. As part of this plan, SCCA works with Institutional Review Boards (IRBs) that safeguard the rights and welfare of human research participants. SCCA has also established and implemented mandatory human subjects protection training for all workforce.

When conducting human subjects research, keep in mind:

- IRB approval and protocol activation are required before human subjects research activity is permitted. IRB oversight is mandatory.
- It is a violation of both federal law and SCCA policies and procedures to:
 - Conduct human subjects research without IRB approval.
 - Not adhere to an IRB-approved protocol.
 - Implement any change to any IRB-approved protocol without IRB approval.
- Before agreeing to participate in human subjects research, the researcher is responsible for ensuring that individuals clearly understand everything that will happen to them, how their information will be used, and their financial responsibilities.
- Individuals are free to choose whether or not to participate in human subjects research and must not be pressured to participate in such research.
- Individuals who choose not to participate in human subject research will not be treated differently in the care and services they receive at SCCA.

Recombinant DNA

Review and approval by the Institutional Biosafety Committee (IBC) is required for use of recombinant DNA, select agents and toxins, and/or biohazardous agents in any research at SCCA. Possession, use, and/or transfer of select agents and toxins without IBC approval and registration puts SCCA at risk of violating federal laws.



Your Rights & Responsibilities

Illegal/Unethical Activities

SCCA is committed to maintaining an ethical culture that is consistent with its **Mission, Vision, Values, and Integrity Principles**. SCCA upholds a “zero tolerance” policy toward any illegal/unethical activity or knowing, intentional, or willing noncompliance. SCCA will not accept a workforce member’s claim that improper conduct occurred for the benefit of SCCA. Any such conduct is expressly prohibited.

Integrity issues can be complex and identifying a suspected violation is not always easy.

Here is a checklist to help:

- Is the action consistent with SCCA’s Values?
- Does the action comply with the SCCA Code of Conduct?
- Does the action violate any state or federal law?
- How would the action look to family, friends, patients, and/or the community if it became a news headline?

Reporting Obligation

It is every workforce member’s responsibility to report a violation or a potential violation.

To report suspected violations or questionable conduct, SCCA workforce may directly contact the Corporate Integrity Officer at (206) 288-6640 or tpranzin@seattlecca.org; alternatively, they may be reported through the Integrity Hotline (866) 353-6098 or online

Patient-
centered

Responsible

at seattlecca.ethicspoint.com, both of which provide an option to report anonymously.

All discussions and reports are treated confidentially and may be made anonymously. Each report is reviewed, and the Corporate Integrity Officer initiates any needed investigations, corrective actions, and/or follow-up.

Non-Retaliation

SCCA encourages, and in some cases requires, its workforce to report any perceived misconduct, including actual and/or potential violations. It is

understandable that some workforce members may be hesitant to report any suspected violations out of fear of retaliation. SCCA has established a non-retaliation policy that covers workforce who, in good faith, report known or suspected instances of Integrity violations.

Governmental Investigations

SCCA cooperates with governmental investigations.

The Integrity Program will assist all workforce with taking the appropriate steps to cooperate with governmental investigations. It is imperative that workforce immediately—even if after hours—notify the Corporate Integrity Officer or the Integrity Hotline if approached by a person who has identified himself or herself as a governmental investigator.

Policies & Procedures

All Integrity, Privacy, & Information Security policies may be found at <https://seattlecca.policystat.com/>.

SCCA Professional Collaboration Policy –
Medical Staff and Other Non-Employee
Licensed Professionals Policy:
<https://seattlecca.policystat.com/policy/1492978/latest/>



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