

compliance program

code of conduct



mission statement

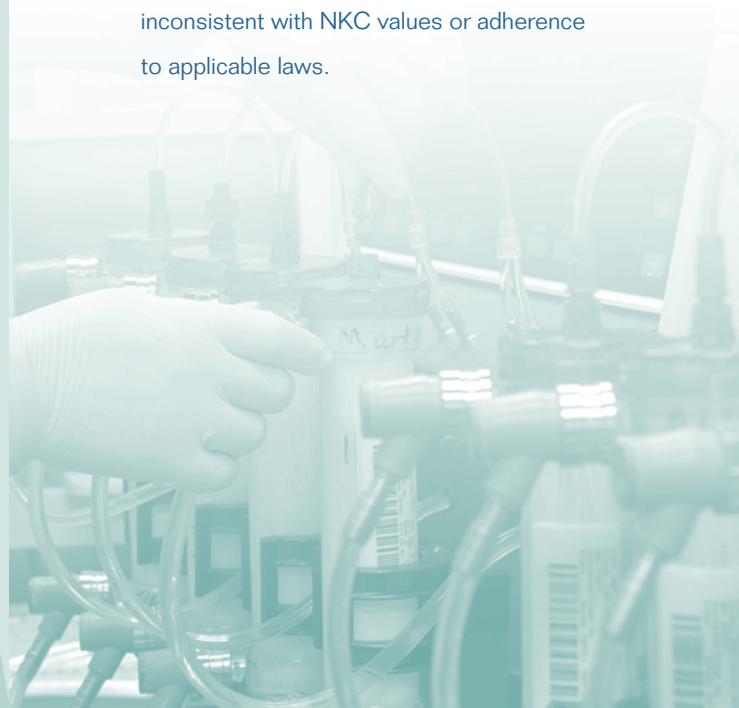
To promote the optimal health,
quality of life and independence of
people with kidney disease, through
patient care, education and research.

Policy Statement

Northwest Kidney Centers has a Code of Conduct to promote ethical, legal and professional behavior by employees and individuals acting on behalf of NKC.

The Code of Conduct provides guidance to employees and others about their responsibility to comply with all applicable federal, state and local laws as well as NKC policies and procedures.

All employees and contractors are required to perform all aspects of their jobs ethically, legally, and professionally and to notify their supervisor or the designated compliance resource if they witness anything that is inconsistent with NKC values or adherence to applicable laws.



NORTHWEST KIDNEY CENTERS CODE OF CONDUCT

- 1. We respect ourselves and each other, as people and professionals, as well as Northwest Kidney Centers as an organization.**
 - a. Problems are promptly brought to the attention of our immediate supervisor. If there are significant differences of opinion in professional judgment these will be reported to the next level of management.
 - b. We are productive during work time.
 - c. We use NKC phones and computers for personal use only on personal time (breaks and lunch).
 - d. We use NKC resources prudently and for NKC purposes.
 - e. We do not discriminate, harass, abuse or intimidate others.
 - f. We protect the confidentiality of any person who files a complaint or concern.
 - g. We do not retaliate against or harass any person who files a complaint or concern.
- 2. We maintain ethical business relationships.**
 - a. We keep patient and employee information confidential consistent with HIPAA regulations.
 - b. We maintain professional standards of practice for employees, volunteers and Medical Staff.
- 3. We avoid conflicts of interest or the appearance of conflicts of interest, and we are in full compliance with all NKC policies relating to patient, employee, volunteer and vendor relations.**
- 4. We comply with all applicable laws and regulations.**
 - a. We know, and to the best of our knowledge comply with, all requirements of the Medicare ESRD program, HIPAA and other applicable federal, state and local laws.
 - b. We accurately document and bill for services provided.
- 5. We comply with all Human Resources and NKC Administrative and Operational policies and procedures.**

INTEGRITY EXCELLENCE

Northwest Kidney Centers Values In the context of Code of Conduct:

Teamwork

NKC employees strive to work together to provide respectful, quality care to all patients. As staff members we respect one another.

Excellence

NKC is committed to providing a high level of professional services that promote the optimal health, quality of life and independence of people with kidney disease.

Integrity

NKC is committed to complying with all applicable laws, rules and regulations related to our services. Personal integrity is honored and respected. All employees and medical staff members are expected to meet or exceed the standards of their profession. In the NKC work environment, concerns regarding integrity can be raised without fear of retaliation.

Service

We are committed to providing community-based services throughout the region. We provide these services in a manner that meets or exceeds standards of care and appropriate laws and regulations. Our Customer Service Standards focus on the 4 Cs – Consideration, Concern, Confidence and Conduct.

Stewardship

NKC seeks to be good stewards of our staff, physical resources, donors' funds, non-profit position in the community, and the trust placed in us by the people we serve.

Resolution of Problems and Concerns

Compliance-related concerns should be addressed by following NKC's policies as outlined in the Employee Handbook and Administrative Policy and Procedure Notebooks. These policies encourage employees to contact immediate supervisors and, if necessary, to proceed through NKC's management levels to reach an acceptable resolution.

Employees may contact the Compliance Officer with concerns or complaints, or call the Compliance Hot Line at (800) 371-2174 (open 24 hours a day, 7 days a week). The Compliance Office and Hot Line are designed to permit any person to call and report a compliance-related concern or obtain clarification on compliance issues. Individuals reporting concerns can choose to do so anonymously.

Individuals who, in good faith, report a possible violation of the Code must not be subjected to retaliation, retribution or harassment by NKC or any of its employees. Any supervisor, manager or employee who conducts or condones retribution, retaliation or harassment in any way will be subject to disciplinary action up to, and including, discharge.

All new employees will review the NKC Code of Conduct during orientation. Information is provided to employees on an ongoing basis.

Introduction

The guiding principles that define Northwest Kidney Centers are its values: Teamwork, Excellence, Integrity, Service and Stewardship.

The Code of Conduct provides broad guidelines to assist you in making decisions but may not cover every situation you will encounter.

This Code applies to all NKC employees, boards, their standing committees, regional council members, volunteers and Medical Staff members. We require contractors, vendors, consultants, and agents to abide by this code when acting on behalf of NKC.

This Code of Conduct was designed:

~ To ensure that all employees and others share in the responsibility to keep NKC in compliance with all applicable laws, regulations, and policies governing business practices. It is imperative that we always hold ourselves accountable for the integrity of the decisions we make and their associated actions.

~ To communicate the commitment of NKC leadership to compliance with laws, regulations, standards of care and policies governing ethical, business and professional practices.

~ To familiarize all NKC employees and others with ethical standards of behavior expected in the workplace.



700 Broadway

Seattle, WA 98122

Compliance Hot Line:
1.800.371.2174

Ph: 206.292.2771

www.nwkidney.org

REV/8/07