



All volunteers are included in EvergreenHealth's Code of Conduct, Work Restriction Policy and Drug Free Workplace Policy. Please read the policies. The last page of this packet contains an attestation for each policy. Please print the attestation page, read, sign and bring the attestation page with you to your first in person orientation.

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Code of Conduct**BACKGROUND**

A key element of the Compliance Program is our *Code of Conduct*. Our *Code of Conduct* is based on our mission and values, and reaffirms the values and professional standards that exist among all who are associated with EvergreenHealth. A foundation of this is our commitment to protecting the integrity of clinical decision making based on patient assessment regardless of compensation arrangements.

Our Code of Conduct was designed to serve several purposes:

- To communicate the commitment of management to comply with laws, regulations, standards of care, ethical business practices and the basic standards expected in the workplace; and
- To ensure that each employee understands his or her responsibility for keeping in full compliance with these laws and regulations and specifically his or her responsibility as part of EvergreenHealth's Compliance Program.

Our *Code of Conduct* and our Compliance Program have the full endorsement of the Board of Commissioners, as well as the management team. Familiarize yourself with this document. It provides an overview of the compliance program and the general areas that it covers.

INTRODUCTION

We at EvergreenHealth recognize that you, our employees, are the key to providing a high quality health care experience for both clinical and nonclinical business activities. We also recognize that we must act in accordance with our *Code of Conduct*, policies, procedures, laws and regulations. Failure to do so can result in serious consequences for individual employees and medical staff members, as well as the organization. Each of you has an affirmative duty to report compliance issues of the Code of Conduct to the Compliance Hotline, your supervisor, manager, or the Corporate Compliance Officer—failure to do so can result in termination.

While our *Code of Conduct* is designed to provide overall guidance, it does not address every situation. More specific guidance is provided in EvergreenHealth's Policies and Procedures. These can be found on Lucidoc, EvergreenHealth's document management site. If there is no specific policy or if a policy and the *Code of Conduct* provision conflict, our *Code of Conduct* becomes the policy.

The *Code of Conduct* is a "living document" that will be updated periodically to respond to changing conditions or regulations. Questions regarding our *Code of Conduct*, or any compliance issue, can be directed to your immediate supervisor, to the Compliance Officer or to upper management. Issues can also be reported confidentially and anonymously to the compliance hotline or directly to the Compliance Officer. For more information about the hotline and placing an anonymous call, please refer to organizational policy (*Corporate Compliance Hotline*).

The Code of Conduct is provided to every employee upon hire and whenever any material change is made to the document. Each employee is responsible for reviewing the Code and completing an

annual attestation stating that he/she agrees to abide by the standards set forth in the Code. Attestations will be maintained in the employee's personnel record or in the LMS system.

ENFORCEMENT

Failure to comply with this Code of Conduct or to conduct business in an honest, ethical, and reliable manner can result in civil fines or criminal penalties against EvergreenHealth and/or its employees and/or corrective action by EvergreenHealth, up to and including termination. Supervisors, Managers, and Directors are responsible for ensuring that their employees participate in any mandatory training related to Corporate Compliance, and complete the annual Code of Conduct Attestation. Completion of the annual attestation is a condition of employment and failure to comply will result in termination. Compliance with the Code of Conduct will be a factor in evaluating the performance of EvergreenHealth employees. (*Corrective Action Guidelines*)

COMMITMENT TO COMPLIANCE

Quality, honesty and integrity in everything we do are important values to all of us who are associated with EvergreenHealth. We are committed to providing quality health care and services in full compliance with our mission and organizational values. We live in a world of constantly changing regulations and requirements. We are committed to adhering to these laws, government regulations, third-party payor agreements and our own policies and have implemented a Corporate Compliance Program to assist in this process.

Our Code of Conduct applies to *all* employees, including supervisors, managers, directors and administrators. It also applies to temporary and contract employees, volunteers, physicians on the medical staff, and, where practical, to independent contractors. The terms "EvergreenHealth", "we", "you", and "Employees" as used in this document, are meant to refer collectively to employees, Board members, providers, volunteers, students and other individuals who are authorized to act as representatives of EvergreenHealth.

Violations of the Code of Conduct have serious consequences for patients, EvergreenHealth, and other employees and must be addressed.

What is my role in the Compliance Program?

- Read and understand the Code of Conduct and other policies and procedures that pertain to your work.
- Remember that each one of us is responsible for keeping the organization in compliance.
- Complete the annual Code of Conduct attestation form
- Ask questions and report concerns if you believe there is a compliance issue.

Mission

To advance the health of communities we serve through our dedication to high quality, safe, compassionate, and cost-effective health care.

Purpose

Working together to enrich the health and well-being of every live we touch.

Vision

To create an inclusive community health system that is the most trusted source for health care solutions.

Values

Shared beliefs that define our culture:

- Compassion
- Respect
- Excellence
- Collaboration
- Accountability

Leadership Principles:

As leaders at EvergreenHealth, we strive to follow the 10 Leadership Principles:

1. We are the stewards of our culture. How we embrace and live our values and these principles cultivates a consistent and intentional culture.
2. We are accountable for achieving exceptional outcomes and for applying the learnings from our successes and failures to help us improve every day.
3. We are committed to continuous, incremental improvement to eliminate waste, inefficiency, ineffective communication, and variations in our care processes.
4. We are “teachers and coaches” supporting the professional growth of our staff, and helping our teams achieve their highest potential.
5. We find opportunities every day to genuinely recognize and celebrate the excellent work of our staff, physicians, and volunteers.
6. We listen and communicate effectively, always seeking first to understand and then to be understood.
7. We are consistently responsive and timely to those we serve.
8. We are inclusive and transparent in our decision making and communications.
9. We are committed to learning and growing as leaders in the application of these principles.
10. We role model healthy and rewarding personal lives that are in balance with the demands of our work.

The Code of Conduct is divided into four major sections:

- I. **Standards of Conduct**
- II. **Patient Care**
- III. **Business Practices**

IV. Workplace Conduct and Employment Practices

I. STANDARDS OF CONDUCT

All of EvergreenHealth's business affairs must be conducted in accordance with federal, state and local laws, professional standards, applicable federally funded healthcare program regulations and organizational policies with honesty, fairness and integrity. You are expected to perform your duties in good faith, in a manner that you reasonably believe to be in the best interest of EvergreenHealth and its patients and with the same care that a reasonably prudent person in the same position would use under similar circumstances.

The standards below are not intended to cover every situation which may be encountered and you are expected to comply with all applicable laws and regulations whether or not specifically addressed in this document. Questions about the existence, interpretation or application of any law, regulation, policy or standard should be directed to your Supervisor, Vice President or to the Corporate Compliance Officer.

Let the following principles guide your behavior and conduct:

ALWAYS...

- Conduct your job with truth, integrity and fairness.
- Treat everyone, including patients, employees, physicians, and visitors with respect and courtesy.
- Document your activities accurately and completely.
- Maintain the confidentiality of all information, written and verbal, related to patients and to the business of the organization.
- Report any real or suspected violation of policy or law to your supervisor or the Corporate Compliance Officer.
- Disclose actual and potential conflicts of interest.
- Ask if you are unsure whether your actions are allowed.

NEVER...

- Make incomplete or inaccurate entries in any hospital medical record, business record, or claim for payment.
- Accept any gifts of more than nominal value, or cash—including tips.
- Seek or accept payment for referrals you receive; or offer to pay, or pay for referrals.
- Make political contributions or engage in political activity on behalf of the organization or while on EvergreenHealth's premises unless on own time without the use of District resources.
- Misuse EvergreenHealth assets or use EvergreenHealth property for personal gain.
- Retaliate against another employee for voicing disagreement with an idea, proposed action, or for reporting a violation of EvergreenHealth policy, the Code of Conduct, or law.

II. PATIENT CARE

Emergency Treatment

We follow the Emergency Medical Treatment and Active Labor Act (EMTALA) in providing a medical screening exam and necessary stabilization of all patients with an emergency condition regardless of their ability to pay. In an emergency situation or if a patient is in labor, we will not delay the medical screening exam and stabilizing treatment to obtain financial or demographic information. Patients with emergency medical conditions are transferred to other facilities only at the patient's request or if the patient's medical needs cannot be met at EvergreenHealth and appropriate care is available at another facility that has agreed to accept the patient. *(Patient Transfers to other Healthcare Facilities)*

Patient Rights

We recognize the personal dignity of all patients and respect their right to participate in decisions regarding medical care and to access and control the use and disclosure of their protected health information. *(Patient Rights and Responsibilities and Notice of Privacy Practices)*

Patient Health Information

Patients' health care records are the property of EvergreenHealth and shall be maintained to serve the patient, necessary health care providers, the institution and third party payors in accordance with legal, accrediting and regulatory agencies. The information contained in the health care record belongs to the patient and must be protected. All patient care information, whether it is electronic, on paper, or oral, must be regarded as confidential and available only to authorized users, such as treating or consulting physicians, employees who are involved in providing treatment, payment processing, or health care operations, and to third party payors in order to facilitate reimbursement. Patient information may never be accessed for personal reasons. *(HR policies Confidentiality/Professionalism & Ethical Behavior; Information Privacy and Security Sanctions, and Access to Health Information).*

Quality of Care and Patient Safety

EvergreenHealth is committed to providing high quality, evidence-based safe care for our patients, and a safe work environment for our employees. We improve care and services by acting on information received from a variety of sources, including SafeLinQ event reporting, patient feedback, audits and case reviews, data analysis, literature, and best practice information. We strive to meet or exceed regulatory standards with the expectation for individual and collective compliance with the standards.

Each employee is accountable for his/her own performance and practice which complies with organizational standards and expectations, and for identifying and reporting variances and opportunities for improvement. While our quality and patient safety activities focus on system and process issues, we address reckless behavior when identified.

We practice transparency by public reporting and sharing of outcome information within EvergreenHealth and with our community.

Employees and medical staff who have concerns about patient safety and/or quality of care are encouraged to report their concerns via SafeLinQ or to the Quality Department. Patients are

encouraged to report their concerns to the Patient Relations department. Concerns may also be reported directly to the Joint Commission or the Department of Health Facility and Service Licensing.

III. BUSINESS PRACTICES

Anti-Competitive Conduct

EvergreenHealth will not engage in anti-competitive conduct that could place an unreasonable restraint of trade or a substantial lessening of competition. Communications with competitors about matters that could be perceived to have the effect of lessening competition or could be considered as collusion or an attempt to fix prices should take place only with administrative approval after consultation with legal counsel.

Anti-Kickback and Self-Referral (Stark)

We shall refrain from any conduct that may violate anti-kickback and self-referral laws. These laws prohibit direct, indirect or disguised payments in exchange for the referral of patients or for services (*Anti-kickback and Self Referral*).

Documentation, Coding and Billing

We are committed to ensuring that documentation, coding, billing and submission of claims to Medicare, Medicaid and other third party payors be appropriate, accurate and in compliance with applicable laws and regulations. This includes billing only for services and care provided and documented, according to medical necessity guidelines. (*Billing and Claims Reimbursement*)

Confidentiality

In addition to patient confidentiality, the operations, activities, business affairs and finances of EvergreenHealth should be kept confidential and discussed or made available only to authorized users for EvergreenHealth's business purposes. (*Confidentiality, Professionalism and Ethical Behavior*)

Examples of business information that must be kept confidential, except to the extent the information is already publicly available:

- Pricing and costs
- Acquisitions, divestitures and other strategic relationships
- Business and marketing plans
- Staffing level plans
- Employee and customer lists
- Research and quality data

Credit Balances

We comply with federal and state laws and regulations governing credit balance reporting and refund all over-payments in a timely manner.

Excluded Business Relationships

Any individual, including Employees, Board members, Physicians, Vendors, Consultants, Contract Individuals or services and other third parties that have been sanctioned by the Medicare, Medicaid, and/or other federal programs, are **excluded** from any business or other relationship with any entity of EvergreenHealth. Only upon reinstatement by the governing agency can a business relationship be considered. Sanctions represent a full range of administrative remedies and actions available to the government to deal with questionable, improper, or abusive practices under the Medicare and Medicaid programs. Sanctions results when a health care provider violates obligations and requirements governing items and services he or she renders bills for and gets paid for on behalf of Medicare or Medicaid beneficiaries. (*Recruitment/Transfer/Pre-employment Screening; and Vendor Policy*)

False Claims Act

We will not knowingly or intentionally submit false, fraudulent, or misleading claims to any government entity or third party payor, including but not limited to claims for services not rendered, claims for medically unnecessary services, claims which characterize the service differently than the service actually rendered, or claims which do not otherwise comply with applicable program or contractual requirements (*Corporate Compliance Program Auditing and Monitoring*). We will not make false representations to any person or entity in order to gain or retain participation in a program or to obtain payment or excessive payment for any service. (*False Claims Act*)

Financial Inducements

We shall not offer any financial inducement, gift, payoff, kickback, or bribe intended to induce, influence, or reward favorable decisions of any government personnel or representative, any customer, patient, contractor or vendor in a commercial transaction or any person in a position to benefit EvergreenHealth or the employee in any way.

EvergreenHealth limits the gifts (other than cash or cash equivalents) to patients to be \$10.00 or less per occurrence and must not exceed \$50.00 in a given year.

Appropriate commissions, rebates, discounts and allowances are customary and acceptable business inducements provided that they are approved by Administration and that they do not constitute illegal or unethical payments. Any such payments must be reasonable in value, competitively justified, properly documented, and made to the business entity to whom the original agreement or invoice was made or issued. Such payments should not be made to individual employees or agents of business entities. Commission, rebates, discounts and allowances shall be accurately reflected on EvergreenHealth's annual Cost Report.

Financial Reporting

All financial reports, accounting reports, research reports, expense accounts, time sheets and other documents must accurately and clearly represent the relevant facts of true nature of a transaction. Improper or fraudulent accounting, documentation or financial reporting is contrary to EvergreenHealth policy and a violation of applicable laws. Sufficient and competent evidential material or documentation shall support all cost reports.

Fraud, Waste and Abuse

We are committed to preventing, detecting and correcting fraud, waste and abuse related to health care benefits, regardless of whether those benefits are paid by the government, a commercial health plan, or an employer. If you are aware of or suspect health care fraud, waste or abuse, you are responsible for reporting it to the Corporate Compliance & Internal Audit Officer.

Investigations

We are committed to investigate all reported concerns promptly and confidentially to the extent possible. The Corporate Compliance Officer coordinates any findings from internal investigations and immediately recommends corrective action or changes that need to be made. All employees are expected to cooperate with internal and external investigation efforts. EvergreenHealth cannot and will not retaliate or discriminate against an employee or other individual who, acting in good faith, reports a violation of the Code of Conduct, EvergreenHealth policy, or law. (*System Resolution of Identified Problems*)

What is a "good faith" report?

If you make a report about something that you believe to be true and that you believe violates the Code of Conduct or another organizational policy or law, it's a good faith report. A report that is made maliciously or frivolously is not in good faith.

Research

All research and other extramurally funded projects conducted by EvergreenHealth employees, or with the use of EvergreenHealth resources or facilities, must be approved by the Department of Research and comply with relevant policies and guidelines. (*Research at EvergreenHealth*)

IV. WORKPLACE CONDUCT AND EMPLOYMENT PRACTICES

Behavioral Standards and Disruptive Conduct

As a critical component of our success, we expect each member of our workforce to provide excellent customer service to our patients, visitors, and each other. This includes treating *all* of our customers with respect, understanding, and caring, as well as demonstrating a positive, "can-do" attitude in all interactions and situations. (*Behavioral Commitments in each job description*)

All persons within EvergreenHealth are to be treated with courtesy, respect, and dignity and all employees and medical staff members shall conduct themselves in a professional and cooperative manner. Employees and Medical staff members who engage in unacceptable disruptive conduct shall be subject to disciplinary action in accordance with EvergreenHealth's corrective action procedures (*Medical Staff Disruptive Conduct Policy, Behavioral Commitments in each Job Description and Corrective Action Guidelines*).

Business Ethics

Employees must accurately and honestly represent EvergreenHealth and should not engage in any activity or scheme intended to defraud anyone of money, property or services.

Conflict of Interest

In order to perform their duties with honesty and fairness and in the best interest of EvergreenHealth, all employees must avoid conflicts of interest in their employment. A conflict of interest or the appearance of a conflict of interest may exist when employees, by reason of their position, authority or knowledge, allow or cause themselves, friends and relatives or anyone with personal ties to benefit directly or indirectly by their actions on behalf of the organization, or allow or cause the organization to be adversely affected in any way. Potential conflicts could be serving on an outside board, have ownership in a company that EvergreenHealth conducts business with or working outside of EvergreenHealth.

Conflicts also may arise in other ways. If an employee has any doubt or question about any of his or her proposed activities, guidance or advice should be obtained from his or her supervisor, the Corporate Compliance & Internal Audit Officer or Human Resources (*Conflicts of Interest, and Conflicts of Interest in Research*). Any employees who have potential conflict of interests must complete the *Conflict of Interest Attestation & Disclosure Statement*.

Duty to Report and Cooperate in Investigations

As a member of EvergreenHealth's workforce, you have an affirmative duty to report compliance issues. EvergreenHealth cannot and will not retaliate or discriminate against an employee or other individual who, acting in good faith, reports a violation of the Code of Conduct, EvergreenHealth policy, or law. However, this does not protect callers from appropriate disciplinary action regarding their own performance or conduct. Any individual who deliberately makes a false accusation with the intent of harming another individual will be subject to disciplinary action. In addition, you have a duty to cooperate in compliance investigations. (See also Response to Subpoenas below).

Equal Opportunity Employment

EvergreenHealth is an equal opportunity employer. As such, EvergreenHealth offers equal employment opportunity without regard to age, race, color, creed, ethnicity, religion, national origin, marital status, sex, sexual orientation, gender, gender identity or expression, disability, veteran or military status, the need to use a trained guide dog or service animal, or on any other basis prohibited by federal, state, or local law. Equal opportunity shall pertain to hiring and firing; compensation, assignment, or classification of employee; transfer, promotion, layoff or recall; job advertisements; recruitment; testing; use of company facilities; training and apprenticeship programs; fringe benefits; pay, retirement plans, and disability leave; or other terms and conditions of employment. Unlawful discrimination will not be tolerated. (*Equal Employment Opportunity; and Equal Opportunity Employment*)

Gifts and Entertainment

You may not accept gifts from patients of cash, cash equivalents (such as gift certificates), or gifts of more than nominal value for your own personal use. With the exception of events which directly benefit EvergreenHealth, employees will not solicit gifts of any nature from current or potential vendors. Gifts, trips, dinners, or other offers with a nominal fair market value (as per EvergreenHealth's Gift Acceptance policy) may be accepted by EvergreenHealth employees as long as the gift is not an enticement to influence a purchase decision. (Gifts - Acceptance and Giving).

The Foundation coordinates all gift acceptance activities and donor records on behalf of all fundraising activities for the District. (*Gift Acceptance and Fund Disbursement*)

Harassment and Workplace Violence

Physical conditions are only one component of the work environment. EvergreenHealth must also be free of discrimination and harassment. Actions, words, jokes, or comments based on an individual's gender, race, ethnicity, national origin, age, religion, disability, veteran status, or any other legally-protected characteristic will not be tolerated. A prompt investigation will be conducted, and we will take appropriate corrective action where it is warranted.

Sexual harassment is a form of misconduct that undermines the integrity of the employment relationship. No male or female should be subject to unsolicited and unwelcome sexual overture or conduct, either verbal or physical. Sexual harassment does not refer to occasional compliments of a socially acceptable nature. It refers to behavior that is not welcome, that is personally offensive, which undermines morale, and therefore interferes with work effectiveness. Sexual harassment committed by any individual associated with EvergreenHealth is specifically prohibited as unlawful and against EvergreenHealth policy. ***Any individual who has reason to believe that he or she is the victim of harassment or discrimination should promptly report the facts of the incident.*** (*Harassment Free Work Environment; Workplace Violence Prevention Program*)

Health and Safety

We are all responsible for making EvergreenHealth a healthy, safe, and caring work environment. You must exercise good judgment with regard to the environmental aspects of the use of buildings, equipment, and supplies, including proper discharge and disposal of any hazardous materials used and/or generated in performing your duties. (*Hazard Communication Program*)

Infection Control policies and procedures have been developed for your safety and the safety of patients we all serve. Failure to follow prescribed policies could place you and others at risk. We are committed to meeting or exceeding all industry standards established for the control of infectious diseases and your adherence to those standards is an essential job responsibility. (*Infection Control Operational Guidelines; Hand Hygiene*)

Inspection and testing of all equipment is also essential. You are expected to be aware of and exercise this responsibility, as your duties may require. Equipment inspections and testing must be done in a timely manner and in accordance with the manufacture's maintenance guidelines. (*Minimizing Risks*)

Information Technology

We have established policies that govern the appropriate use of our information technology resources, including personal use of the internet and EvergreenHealth email systems, security mechanisms, and downloading of software. (*Appropriate Use of Computing Resources*)

What can I do to help protect our information?

- Never share your computer passwords with anyone for any reason
- Lock or log off your computer work station before you walk away

- Don't open email attachments that are suspicious or come from someone you don't know
- Secure mobile computing devices, such as laptops, cell phones, PDAs, and thumb drives.

Intellectual Property

Employees will not disclose or misuse any confidential or proprietary information or trade secrets that they have access to during the course of their employment with EvergreenHealth and even after their employment at EvergreenHealth ends.

Employees may, during the course of their work at EvergreenHealth, develop or be part of a team that develops a new invention, published work, software program or other type of intellectual property. If an employee develops intellectual property within the time and scope of their work at EvergreenHealth, because EvergreenHealth pays their compensation and provides all facilities and resources for their work, EvergreenHealth owns the rights to the invention. (*Intellectual Property at Evergreen*)

Political Activity

As a public hospital district, EvergreenHealth cannot engage in any political activity that promotes or opposes a particular point of view or candidate, except in certain limited situations. You may not participate in political activity on EvergreenHealth premises or as a representative of EvergreenHealth.

What kind of political activity can an employee participate in?

You may, as a private citizen, participate in political, charitable, community, and other similar organizations, so long as:

- Your participation does not raise a conflict of interest,
- It is on your own time without the use of District resources and
- you do so as a private citizen and do not imply endorsement by EvergreenHealth.

Protection of Assets

EvergreenHealth will make available to employees assets and equipment necessary to conduct EvergreenHealth business including such items as computer hardware and software, billing and medical records (hard-copy and/or in electronic format), fax machines, office supplies, copy machines and various types of medical equipment. Employees should use these assets in a prudent and effective manner. EvergreenHealth property should not be used for personal reasons or be removed from our facilities without appropriate approval. Employees are expected to report time and attendance accurately. (*Timecards*)

Employees are also expected to adhere to EvergreenHealth's policies regarding Record Management, Retention, and Destruction. (*Records Disposition Management; Records Retention*)

Response to Subpoenas

EvergreenHealth has a specific policy about responding to a subpoena or search warrant. In general, employees should not accept service of a subpoena and should contact Administration immediately. (*Response to Subpoenas and Search Warrants; Legal Investigations; and Court Orders*)

Substance Abuse

EvergreenHealth is a drug free environment. You must report to work on time and free of any drug or alcohol that can impair your job performance or risk the health and safety of patients, other employees or guests. Unlawful manufacture, distribution, dispensation, possession or use of drugs and/or alcohol is prohibited on EvergreenHealth grounds or during work time and will result in disciplinary action, up to and including dismissal.

We recognize drug and/or alcohol dependency as a major health problem and encourage you to seek rehabilitation referral through our Employee Assistance Program and to access your health insurance benefits if you need help with dependency. All referrals are confidential.

If you are convicted of a drug related crime occurring at the workplace you must notify Human Resources within five days of the conviction. (*Substance Abuse*)

ADDITIONAL STANDARDS

EvergreenHealth has adopted a number of other organizational policies and procedures. Employees may obtain copies from the Lucidoc document repository (Policies/Lucidoc) on the EverLink intranet site. There may also be additional standards and policies that are applicable to particular departments and copies may be obtained from supervisors, managers, or directors in those departments.

CONTACT INFORMATION

Corporate Compliance & Internal Audit Officer
425-899-2011 or Compliance@evergreenhealth.com

Compliance Hotline
425-899-5599
Compliance@evergreenhealth.com

Signed by	(10/22/2015 09:45AM PST) Robert Malte, CEO	Document Owner	Meeks, Richard A
Effective	10/22/2015		
Revised	[09/30/2004 Rev. 1], [06/01/2008 Rev. 2], [10/21/2014 Rev. 3], [10/22/2015 Rev. 4]		

POLICY

Persons with an infectious disease or who are susceptible and exposed to an infectious disease shall be restricted from direct contact with patients when transmission of the disease to the recipients of care or others in the workplace can occur in that particular job environment and/or the disease can cause serious illness.

All healthcare workers are strongly encouraged to receive recommended vaccines including influenza. There is a zero tolerance policy regarding employees working with febrile illnesses or uncontrolled cough. However, in the event of accidental person to person transmission or an illness or an outbreak, appropriate follow up can be received in Employee Health Services.

INCLUSIONS:

EvergreenHealth employees, physicians, students, volunteers and vendors employed or contracted by EvergreenHealth.

PURPOSE

To prevent transmission of infectious diseases to patients, visitors and staff within EvergreenHealth.

PROCEDURE

Employee Health (425.899.2282) or after hours the Healthline (425-899-3000) should be consulted if there are questions concerning the safety of allowing employee to return to work.

Food service workers should follow the work restriction guidelines found in the FDA 2009 Food Code <http://www.fda.gov/Food/GuidanceRegulation/RetailFoodProtection/FoodCode/>

1. Healthcare workers must report to Employee Health Services if using assistive devices/appliances (i.e. splints, braces, crutches, walking boots, canes, walkers, casts) in which the healthcare worker is unable to practice appropriate hand hygiene in accordance with infection control requirements and/or may be a safety risk to himself/herself or others.
2. An employee who believes he/she may be in the early stage of an infectious illness must remain home and consult their health care provider. See table of work restrictions for specific diseases.
3. Employees should not report to work if they have:
 - a. Fever of 100.5 or more, by itself or with any of the following symptoms:
 - i. Cough, runny nose, or sneezing
 - ii. Sore throat
 - iii. Swollen glands

- b. Eye infections
 - c. Vomiting
 - d. Diarrhea (more than one loose stool per day)
 - e. Uncontrollable cough
 - f. Undiagnosed rash and / or (+/- fever)
 - g. Jaundice
 - h. Lesion containing pus that is open and draining
4. If the employee has an illness diagnosed by a Health Practitioner due to:

The employee should report this to their employer and not return to work until cleared by a health care provider and Employee Health Services. **The manager or supervisor should report this to Employee Health Services immediately.**

- a. Norovirus
 - b. Hepatitis A virus
 - c. Shigella spp.
 - d. Enterohemorrhagic or Shiga Toxin producing Escherichia coli
 - e. Salmonella Typhi
5. Work Clearance - Employees are required to report to Employee Health and if appropriate, the Worker's Compensation and Leave of Absence Coordinator in Human Resources for a Fitness for Duty work clearance for the following reasons:
- a. Employees with signs/symptoms of a communicable illness or returning to work after a communicable illness or infection treated by a health care provider.
 - b. Employees returning to work with a condition that may pose a safety and/or infection control risk, including but not limited to, a cast, splint, crutches, brace, cane or wheelchair. Review HR Leave of Absence Policy for Return to Work Accommodation Requests. Leaves of Absence, HR-L901

If the employee is already at work, he/she must take protective measures to prevent transmission until the situation can be evaluated and they can be released from their work duties. Arrangements for the employee to be relieved of duty as soon as possible must be made through the manager or designee. The manager or employee may call Employee Health Services (EHS) or Infection Control if they have questions.

A physicians release and approval by Human Resources and EHS may be required for an employee to return to work after an illness. (See other related HR documents below).

Guidelines for managing employee work restrictions are listed in the table.

The Medical Director of Infection Control and/or Employee Health may be consulted if needed.

SECTION I. An employee with an infectious illness or exposure to an infectious disease may not work in the hospital environment during the known period of communicability.

Medical Condition	Work Restriction	Return to work criteria
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<p>Chickenpox (Varicella zoster)</p> <ul style="list-style-type: none"> • Active • Post exposure <p>(susceptible employee)</p>	<ul style="list-style-type: none"> • Contagious period is one to two days before the rash appears and until all the blisters form scabs. It takes 10 to 21 days after contact with an infected person for someone to develop chickenpox. Exclude from duty • Exclude from duty. From 10th day after first exposure through the 21st day (or 28th day if VZIG given) after last exposure. 	<ul style="list-style-type: none"> • Until all vesicles are dried and crusted. • May return to work after 22nd day and no infection
<p>Herpes simplex</p> <ul style="list-style-type: none"> • Genital • Hands (Herpetic Whitlow) • Orofacial 	<ul style="list-style-type: none"> • Employees may work with good hand washing. • Restrict from patient contact and contact with the patients environment. • Exclude from duty in NICU, Pediatrics, Women's services or with any severely immunocompromised patients. 	<ul style="list-style-type: none"> • N/A for genital • Until lesions heal. Must be cleared by Employee Health prior to returning • Must be cleared by employee health
<p>Zoster (Shingles)</p> <ul style="list-style-type: none"> • Active (localized in healthy person) • Generalized or localized in immunosuppressed employee • Post exposure (susceptible employee) 	<ul style="list-style-type: none"> • Non-clinical employees may work outside of patient care areas with lesions covered. Restrict from patient contact. • Restrict from patient contact • Restrict from patient contact 	<ul style="list-style-type: none"> • Until all lesions dry and crusty • Until all lesions dry and crusty • From 10th day after first exposure through 21st day (28th day if VZIG given) after last exposure or if varicella occurs, until all lesions dry and crusted
<p>Measles (Rubeola, hard measles)</p> <ul style="list-style-type: none"> • Active • Post exposure (susceptible) 	<ul style="list-style-type: none"> • Exclude from duty • Exclude from duty 	<ul style="list-style-type: none"> • Until seven days after rash appears • Until 5th day after first

employee)		exposure through 21 st day after last exposure and /or 4 days after rash appears.
Rubella <ul style="list-style-type: none"> • Active • Post exposure (susceptible employee) 	<ul style="list-style-type: none"> • Exclude from duty • Exclude from duty 	<ul style="list-style-type: none"> • Until 5 days after rash appears • Until 7th day after first exposure through 21st day after last exposure and/or 5 days after rash appears
Mumps <ul style="list-style-type: none"> • Active • Post exposure (susceptible employee) 	<ul style="list-style-type: none"> • Exclude from duty • Exclude from duty 	<ul style="list-style-type: none"> • For 9 days after onset of parotitis (swelling or parotid glands) • from 12th day after first exposure through 26th day after last exposure or until 9 days after onset of parotitis
Medical Condition	Restriction	Return to work criteria
Influenza like illness (ILI) <ul style="list-style-type: none"> • Incubation 1-3 days 	<ul style="list-style-type: none"> • Exclude from duty 	<p>until all of the following criteria are met:</p> <ul style="list-style-type: none"> • At least 5 days have passed since the symptoms of illness began; AND • Fever has resolved and has not been present for at least 24 hours; AND • Cough is improving (decreasing in frequency and amount of secretions with no associated chest discomfort or shortness of breath) <p>Upon returning to the work environment, employees should continue to follow cough etiquette and hand washing protocols.</p>
Viral respiratory infections, acute febrile	Restrict from direct patient care NOTE: An employee who has cold symptoms, such as runny nose without fever must wear a surgical mask during	until acute symptoms resolve and respiratory secretions are controlled.

	patient contact and practice rigorous hand hygiene.	
Pertussis <ul style="list-style-type: none"> • Active • Post Exposure (asymptomatic employee) • Post Exposure (symptomatic employee) 	<ul style="list-style-type: none"> • Exclude from duty for five days after start of effective antimicrobial therapy or until 3 weeks after the onset of paroxysms if appropriate antimicrobial therapy is not given. • No restriction, prophylaxis if applicable, evaluation by Employee Health required • Exclude from duty 	<ul style="list-style-type: none"> • Upon completion of <ul style="list-style-type: none"> ○ From beginning of catarrhal stage through 3rd week after onset of paroxysms <ul style="list-style-type: none"> ▪ OR ○ until 5 days after start of effective antimicrobial therapy • until 5 days after start of effective antimicrobial therapy.
Rubella (German measles) <ul style="list-style-type: none"> • Active • Post-exposure (susceptible personnel) 	<ul style="list-style-type: none"> • Exclude from duty • Exclude from duty 	<ul style="list-style-type: none"> • Until 5 days after rash appears • return once they have passed the 21st day after last exposure
Scabies	Exclude from Duty	Until 24 hours after initiation of appropriate treatment and cleared by EHS.
Pediculosis (lice)	Restrict from patient contact	Until treated and observed to be free and clear of adult and immature lice (nits), Must be cleared by EHS
Tuberculosis <ul style="list-style-type: none"> • Active disease • TST converter 	<ul style="list-style-type: none"> • Exclude from Duty • No restrictions after active disease ruled out. 	<ul style="list-style-type: none"> • Until receiving appropriate therapy and clinical improvement. The infectious disease physician shall review the case prior to allowing the employee to return to work.
SECTION II. An employee may or may not require work restriction due to specific acute infections or carrier states.		
Staphylococcus aureus	<ul style="list-style-type: none"> • Restrict from contact with patients and 	<ul style="list-style-type: none"> • Until lesions resolve

<ul style="list-style-type: none"> • Active, draining skin lesion • Carrier state 	<p>patients environment or food handling</p> <ul style="list-style-type: none"> • No restrictions, unless employee are epidemiologically linked to transmission of the organism. 	
Streptococcal infection, group A	Restrict from patient care, contact with patient's environment or food handling	Until 24 hours after adequate treatment started.
Acute hepatitis B, HBsAG positive Acute hepatitis C HIV positive or AIDS	Consult with EHS Infection Control Medical Director will evaluate on a case by case basis.	
Neisseria meningitidis (meningococcus) <ul style="list-style-type: none"> • Acute • Post Exposure (close intimate contact with positive patient) 	<ul style="list-style-type: none"> • Exclude from duty • Prophylaxis required 	<ul style="list-style-type: none"> • Until 24 hours after start of effective therapy
Hepatitis A, Salmonella, Campylobacter, Shigella, Cholera, Worms/Parasites, Amebiasis	Food handlers are restricted. In other health care workers, evaluation by Employee Health or Infection Control is necessary.	

SECTION III. An employee must be evaluated by Employee Health or their health care provider regarding the they have signs or symptoms of the following:

- Any possible or diagnosed infectious condition, such as skin infections, pertussis, C diff, shingles.

Signed by (03/04/2015 03:07PM PST) Francis X Riedo,
MD, Medical Director
(03/10/2015 02:59PM PST) Kathleen C
Groen, Dir-Employee & Labor Relations
(03/27/2015 12:06PM PST) Nancee R
Hofmeister, RN, VP-Chief Nursing Officer

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Document Owner

Kreider,
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PURPOSE

EvergreenHealth is committed to promoting and maintaining an environment that is conducive to the safety, health and well-being of employees, patients and visitors. EvergreenHealth expects employees to function in a safe, professional, productive and effective manner while on duty and if fitness for duty and/or reasonable suspicion is a concern, may require employees to satisfactorily complete a fitness for duty evaluation to ensure their ability to perform within a specific job classification and department without endangering their own health and safety, or that of patients or other employees.

SCOPE

All EvergreenHealth employees including all volunteers, contracted and/or temporary employees, vendors and employed and credentialed Providers.

DEFINITIONS

Chemical dependency. Chemical dependency means an assessment by a licensed chemical dependency counselor, treatment facility, or impartial physician that the evaluated employee is addicted to one or more controlled substances including drugs and/or alcohol.

Controlled Substances. Controlled Substances means a controlled substance in Schedules I through V of Section 202 of the Controlled Substance Act (21 U.S.C. 812) and as further defined in regulation 21 (CFR 1308.11-1308.15). Examples include, but are not limited to: hallucinogens (Darvon), amphetamines, marijuana (cannabinoid metabolites), barbiturates, methadone, benzodiazepines, opiate derivatives (heroin, morphine, codeine), cocaine metabolites, phencyclidine (PCP), meperidine, oxycodone, Propoxyphene, fentanyl.

Conviction. Conviction means being convicted, pleading guilty, or entering a plea of "no contest" in a court of law.

Corrective Action. Corrective action may include any and all steps up to and including immediate termination of employment without advance notice or warning.

Diversion. For purposes of this policy, diversion means obtaining EvergreenHealth drugs or drugs of EvergreenHealth patients or employees for personal or unauthorized use or distribution, including illegal sale. Examples of diversion include administering a smaller-than-prescribed dose, substituting saline or other substance for a patient's medication, withholding medication from a patient for the employee's own use, or any steps taken to tamper with an AcuDose machine or alter its proper dispensation functions.

Drugs not Medically Authorized. For all purposes under this policy, drugs not medically authorized means any drug not prescribed, or prescribed but not used as prescribed. For example, taking a prescription drug which is intended for someone else, taking a prescription drug outside of the

prescribed directions; taking an over-the-counter drug outside of the package directions; or taking any drug for purposes other than that for which is it prescribed or intended.

Illegal Drug. For all purposes of this policy, illegal drug means any drug not legally obtained or legally used. The term includes prescription drugs obtained illegally and prescription drugs not used as prescribed.

Legal Drug. For all purposes under this policy, legal drug includes prescribed and over-the-counter drugs legally obtained and used as prescribed or directed, whether by a health care provider or in accordance with package instructions.

Premises. Includes all buildings and facilities used by EvergreenHealth to conduct its operations and all work sites to which employees assigned in the performance of their duties for EvergreenHealth, including parking garages and grounds.

Reasonable Suspicion. For all purposes under this policy, reasonable suspicion shall be defined as a belief based on observed fact, where the reasonable inference to be drawn under the circumstances is that the person could be under the influence of drugs or alcohol, could be in possession of an illegal drug or could be involved in the manufacture, distribution or sale of an illegal drug, i.e. an accident during work time may provide reasonable suspicion.

Under the Influence. For purposes of this policy, being under the influence means that the employee is affected by a drug or alcohol, or the combination of drugs and alcohol in any detectable manner. The symptoms of the influence are not confined to those consistent with misbehavior, or to obvious influence of physical or mental ability such as slurred speech or difficulty in maintaining balance. See Behavior Observation Tool for additional observed behaviors and/or actions.

PROCEDURE/RESPONSIBILITY

The use, diversion, possession, distribution, sale or manufacture of alcohol, controlled substances, drugs not medically authorized and/or in violation of state and/or federal laws, or other substances which may impair job performance and/or pose a hazard on EvergreenHealth property, or at off-site locations where services are provided, or while operating a vehicle on EvergreenHealth business, is strictly prohibited. Below are examples of violations of this Drug Free Workplace policy:

1. Working or performing job responsibilities under the influence of or impaired by alcohol or drugs, prescribed or otherwise;
2. Use of alcohol on the premises or during work time on or off campus, including break and lunch periods;
3. Use of legal or illegal drugs not medically authorized on the premises or during work time on or off campus, including break and lunch periods;
4. Use of legal or illegal drugs that are medically authorized, unless the employee has previously notified his or her immediate supervisor or supervisor on duty and obtained a medical evaluation from a certified Health Care Provider certifying that the recommended dosage does not impact the employee's ability to perform his or her required job duties;
5. Possession of controlled substances, unless acting within the scope of an employee's job duties;
6. Diversion of controlled substances.

7. The use of Marijuana, which is a Schedule 1 controlled substance under federal law, is expressly prohibited under this policy even if its medical use or recreational use is authorized under state law.

In addition, violations of this Drug Free Workplace policy may involve violation of other EvergreenHealth policies such as HIPAA, theft, inappropriate computer or equipment use, falsification of records, etc., and in such cases will be subject to separate corrective action. See Policy HR-LR 1002 Corrective Action.

In accordance with federal and state guidelines and other EvergreenHealth policies and procedures (including but not limited to: Fitness for Duty, Pre-Employment Drug Testing, Code of Conduct) EvergreenHealth reserves the right, at its discretion to send employees for drug testing on reasonable suspicion of a violation of this policy.

EvergreenHealth will comply with all pertinent federal or state requirements, including those of Washington Health Professional Services (WHPS) and Washington Physician Health Program (WPHP). This includes required reporting confirmed diversion of controlled substances and/or positive test results to the local, state and federal authorities, appropriate licensing pharmacy board and state and federal law enforcement agencies.

EvergreenHealth encourages employees experiencing problems with drugs, alcohol or other substances to voluntarily seek assistance, either through outside agencies or through the Employee Assistance Program (EAP). Employees experiencing chemical dependency may be referred by EvergreenHealth to the EAP and/or a state approved program/treatment center and may require participation as a condition of continued employment. Alternatively, an employee may voluntarily disclose his or her chemical dependency, and, if circumstances otherwise support it, undertake a leave of absence under the applicable EvergreenHealth policy. Voluntary participation and self disclosure may mitigate against corrective action where the misconduct arises from a drug or alcohol problem.

* For examples of behaviors that may indicate a drug or alcohol impairment see the Behavior Observation Form.

Employee Responsibilities

- Employees are responsible for being at work fit for duty and free of drug and alcohol impairment.
- Any employee who is concerned or reasonably suspects that a fellow employee may be under the influence of drugs or alcohol while acting within the course and scope of their duties and/or may be diverting controlled substances, or may be involved in the manufacture, distribution or sale of an illegal drug is expected to report that individual and the specific behaviors to support the suspicion to his/her immediate supervisor, House Supervisor (705) or to Human Resources.
- Employees are expected to advise their immediate supervisor or supervisor on duty or Human Resources of the use of prescription medications or other substances that may impair performance. If requested, the ability to perform required job duties safely and effectively while taking such medications or substances will be evaluated by Human Resources and if needed, a medical evaluation from a certified Health Care Provider. Prescription and nonprescription medications are not prohibited when taken in accordance with a lawful prescription and consistent dosage recommendations so long as they do not impact an

employee's ability to perform the required job duties. The suspicion and knowledge of associated EvergreenHealth investigation and corrective responses will be kept confidential except from individuals with a clear "need to know."

- An employee must notify Human Resources of any drug related conviction within five days of receiving the conviction. Failure to notify Human Resources may result in immediate correction action. EvergreenHealth reserves the right to address suspicious or inappropriate behavior through the progressive corrective action process even if drug test results are negative.

Management Responsibilities

Supervisors/Managers are expected to immediately report all suspected or known improper handling or diversion of drugs to Pharmacy and Human Resources.

If the Supervisor/Manager has a reasonable suspicion that the employee is under the influence of drugs or alcohol and/or is diverting controlled substances, the supervisor should relieve the employee of job duties immediately and contact Human Resources or if after normal work hours the House Supervisor (705). See Fitness for Duty, Drug and Alcohol Testing and Diversion of Controlled Substances procedures for further details of the Supervisor's responsibility to take action promptly in such cases. In addition, for Providers, the following people must be notified: the Medical Director (?Chief of the Department) to which they are assigned, and EvergreenHealth's appropriate Vice President and Chief Medical Officer.

The Supervisor/Manager/Director is responsible for reporting employees in licensed, registered or certified positions with positive test results or confirmed diversion of controlled substances to the appropriate regulatory agencies including but not limited to, the Washington State Board of Pharmacy, Washington State Health Care Commission Division of Licensing and other boards, as well as law enforcement agencies, as required by Washington State law.

Human Resources Responsibilities

Human Resources will work with the employee and his/her manager to ensure proper compliance with the policy and will partner with Employee Health as needed.

Employee Assistance Program (Assistance in Recovery)

EvergreenHealth provides an Employee Assistance Program (EAP) through which employees may seek confidential assistance in the resolution of chemical dependency or other problems which are capable of impacting job performance. Any employee who struggles with alcohol, prescription drug, or illegal substance abuse is strongly encouraged to voluntarily seek assistance through the EAP. The employee may not be disciplined for seeking voluntary assistance. However, entry into a treatment program will not exempt the employee from the requirement to sustain satisfactory future performance, conduct and attendance.

An employee who diverts a controlled substance and/or tests positive for other presence of drug and/or alcohol and/or as determined by the employer may be referred as appropriate to the Employee Assistance Program (EAP) and/or a state approved program/treatment center for treatment. See Behavioral Observation Form, Diversion of Controlled Substance and Drug and Alcohol Testing Procedures. If the assessment comes back with recommendations for treatment, and the employee

complies with the treatment recommendations, the employee may be eligible for FMLA coverage, or placed on a disability leave of absence, each in accordance with the EvergreenHealth Leaves of Absence Policy.

If referred to the EAP for drug and/or alcohol related treatment as a condition to continued employment, an employee who fails to (i) follow the recommendations of the EAP, (ii) comply with terms of a last chance agreement, (iii) successfully complete treatment, or (iv) successfully complete all segments of a state rehabilitation program, will be subject to corrective action. Cooperation with the EAP, or participation in a state licensed rehabilitation program, does not guarantee continued employment with EvergreenHealth or preclude corrective action. Nor does such cooperation or participation relieve the employee of his/her responsibility to perform assigned duties in safe and efficient manner. See Policy HR-LR 1002 Corrective Action.

This policy is not a substitute for government regulation of employees who are licensed by the State of Washington (e.g. registered nurses, pharmacists, medical doctors). Positive drug/alcohol test results will be reported to the Washington Health Professionals Service (WHPS) or other State program which will be responsible for informing the appropriate agency per licensing requirements, such as the Washington State Department of Health.

Signed by	(11/04/2014 02:31PM PST) Bob E Sampson, VP, HR		
Effective	11/04/2014	Document Owner	Groce, Jessika
Original Effective Date	11/04/2014		
Revised	[11/04/2014 Rev. 0]		



**Volunteer Attestations for:
Code of Conduct
Work Restriction Policy
Drug Free Workplace**

Volunteer Name: _____

Code of Conduct:

Volunteers are included in EvergreenHealth's Code of Conduct policies, procedures, laws and regulations. I certify that I have read the Code of Conduct and agree to abide by the overall guidance, policies, procedures, laws and regulations.

Volunteer Signature: _____ Date: _____

Work Restriction Policy:

EvergreenHealth Volunteers are included in the Work Restriction Policy. My signature below indicates that I have read and understand the Work Restriction Policy. I will follow the guidelines set forth in the policy regarding infectious diseases and will consult Employee Health (425-899-2282) or, if after hours, the Healthline (425-899-3000) if I have any questions concerning whether or not I should come in for my volunteer shift.

Volunteer Signature: _____ Date: _____

Drug Free Workplace:

I have read the Drug Free Workplace Policy and understand that the use, diversion, possession, distribution, sale or manufacture of alcohol, controlled substances, drugs not medically authorized and/or in violation of state and/or federal laws, or other substances which may impair volunteer performance and/or pose a hazard on EvergreenHealth property, or at off-site locations where services are provided, is strictly prohibited.

Volunteer Signature: _____ Date: _____