# Table of Contents

## 13 **CHAMPION EQUITY**
- 14 Equity, Diversity and Inclusion (EDI)
  - Culture and Climate
- 15 Patient Rights and Responsibilities
  - Patient and Visitor Non-Discrimination
  - Patient Privacy
- 16 Emergency Care and EMTALA
  - Coworker Interactions
  - Harassment and Workplace Violence

## 17 **DISCOVER WHAT'S POSSIBLE**
- 18 Innovative Research
- 19 Marketing and Media Communications
  - Social Media

## 20 **COMPLIANCE AND INTEGRITY**
- 21 The Role of the Compliance and Integrity Program
  - Purpose
  - Reporting Concerns
- 22 Acknowledgement

---

Questions or concerns? Visit [hotlineservices.com](http://hotlineservices.com) or call **855.252.7606** | 1
A message from the CEO

Dear Colleagues,

I am sincerely grateful for your dedication to the enduring mission, purpose and core principles of Ann & Robert H. Lurie Children’s Hospital of Chicago. Each day we ground ourselves in integrity, champion equity and commit to discovery as we drive for excellence in outcomes and experiences for our patients and families. Leveraging the Power of All, we work together to achieve this in a safe and inclusive environment for our patients, families and each other.

This collective effort is anchored in this Code of Conduct. More than words on paper, it is a roadmap that drives our organization forward as a national leader in providing a healthier future for every child. These behaviors will allow us to achieve our ambitious goals, while also meeting compliance standards with all applicable regulations, laws, policies and guidelines in an ever-increasingly-complex healthcare environment. Regardless of our role at Lurie Children’s, each one of us is accountable for our actions and the potential legal and ethical implications behind them. We must fully adopt these principles within our Code of Conduct to avoid putting our patients, their families, the organization and ourselves at physical, emotional or financial risk.

Consistent with our high-reliability principles, I urge all of us to stay observant, speak up and ask questions. If you suspect any unethical or illegal conduct or are not sure of the right thing to do in a situation, please contact the Office of Compliance and Integrity (OCI). The OCI is available to support you and will handle your concerns appropriately. Expressing a concern about a compliance matter is not only permissible — it is encouraged. Know that retaliation for any complaint made in good faith is strictly prohibited.

We must always hold ourselves to this high standard of professionalism and service, as we have the ultimate responsibility to do what is right in continuously striving to keep our organization safe for patients, their families and each other.

Following the Code of Conduct and committing to the values set forth in it are essential to each of our roles in creating a healthier future for every child. Thank you for taking the time to read it carefully and embracing it. And thank you for all you do for the patients and families we have the privilege to serve.

Sincerely,

Thomas P. Shanley, MD
President and CEO
Ann & Robert H. Lurie Children’s Hospital of Chicago

Questions or concerns? Visit hotlineservices.com or call 855.252.7606
Table of Contents

Know our principles, Live our Code

Our principles and culture are reflected in this Code
Our PURPOSE
We ignite hope in the pursuit of healthier futures for children and families across Chicago and beyond.

OUR PRINCIPLES
Together we...

Lead with integrity
Practice courage and honesty, speak up for what is right and be accountable to our teams, people and patients.

Champion equity
Treat everyone fairly, appreciate differences and make meaningful connections with each other to foster allyship and belonging.

Discover what’s possible
Embrace creativity and new ideas, continuously learn and improve and be a catalyst for positive change every day.

Our Code helps us do the right thing
This Code of Conduct ("the Code") guides and empowers us to do the right thing. It establishes standards of behavior that will allow us to fulfill our mission in a constantly changing healthcare environment full of complex laws, regulations, policies, procedures and accreditation requirements.

The Code applies to all organizations affiliated with Children’s Hospital of Chicago Medical Center (collectively referred to as “Lurie Children’s”), all employees, medical/dental staff members, faculty, residents, officers, directors, agents, volunteers, contractors, consultants, students, vendors and anyone else acting on behalf of Lurie Children’s.

Our Code helps us know our responsibilities
No matter what our role, we each represent Lurie Children’s. We count on every person to conduct themselves in a way that preserves the trust placed in us by our patients and families. The Code provides an overview of how we are expected to conduct ourselves when acting on behalf of Lurie Children’s. While it may not specifically address every situation we may encounter, it does cover basic principles that can guide us in making good decisions and reaching out for help when we need it.
To make sure our actions always reflect Lurie Children’s principles, each of us has the following responsibilities:

- We are personally responsible for our own behavior
- We obey the law
- We know the Code and follow its standards in our daily work
- We promote a culture of collaboration, respect and inclusion
- We ask questions when the right course of action is unclear to us
- We complete mandatory training to increase our understanding of the Code
- We immediately report any suspected violations of the Code
- We escalate compliance concerns raised to us by those we supervise
- We fully cooperate with internal investigations
- We promptly and appropriately respond to requests for information pursuant to external investigations and accreditation and regulatory surveys

LEADERSHIP RESPONSIBILITIES

Our leaders model the principles of Lurie Children’s to our staff, patients, families and the community. It is key that they lead by example through their own conduct by:

- Demonstrating the highest ethical standards of behavior
- Ensuring their staff understand the standards and expectations outlined in the Code
- Fostering a safe environment where staff are comfortable raising concerns without fear of retaliation
- Taking prompt action to address concerns raised by staff

CONSIDER YOUR CONDUCT

In every situation, ask yourself:

1. Is my conduct inconsistent with our mission, purpose or principles?
2. Is it a violation of the Code, policy or law?
3. Could it harm the reputation of Lurie Children’s?
4. Would I feel uncomfortable if everyone knew about it?

If you say “YES” to any one of these questions or are not sure, ask for guidance.
Our Code helps us speak up without fear

Misconduct impacts us all. We want to do what is right by our patients, families, colleagues, community and organization. Legal and ethical violations can harm all of us personally, financially and reputationally.

When we see unethical, discriminatory or illegal behavior, it may seem easier to look the other way because we do not know what we can do about it.

However, there is something very important you can do: Speak up!

Reporting our concerns allows us to identify and correct issues before they become a bigger problem and helps safeguard Lurie Children’s integrity and reputation as an ethical, caring and anti-racist organization.

WHAT IF?
I reported a compliance concern, and I think my supervisor is retaliating against me for doing so. Can they do this?

No. We know it takes courage to report your concerns. Lurie Children’s has zero tolerance for retaliation against any person who honestly raises concerns about potential wrongdoing. Anyone who engages in or allows any form of retaliation or harassment will be subject to discipline.

Non-Retaliation Policy

HOW TO REPORT CONCERNS

• To your supervisor
• To the Office of Compliance and Integrity (OCI) 312.227.5288
• To the Hotline (24/7 anonymous reporting is available) hotlineservices.com 855.252.7606
LEAD WITH INTEGRITY

Practice courage and honesty, speak up for what is right and be accountable to our teams, people and patients
CONFLICTS OF INTEREST

We make business decisions that are in the best interests of the organization and are not influenced by potential personal gain. We disclose any outside financial, professional or personal activity or interest that could appear to influence our judgment when performing our duties. Any potential conflicts will be reviewed and managed to prevent improper influence where conflict might exist.

If you are uncertain whether an activity or interest may qualify as a conflict of interest, please contact the Office of Compliance and Integrity. (Conflict of Interest Policy)

WHAT IF?

I am a physician and would like to refer patients for occupational therapy at a practice owned by my spouse. He is the best therapist around! Is that okay?

This arrangement could appear to be a conflict of interest and is a possible violation of the law. Contact the Office of Compliance and Integrity and Legal Department for review.

RELATIONSHIPS WITH PHYSICIANS AND OTHER REFERRAL SOURCES

The Physician Self-Referral Law (commonly known as the “Stark Law”) and the federal Anti-Kickback Statute govern our relationships with providers, vendors, patients and business partners. Violations of these laws may lead to administrative sanctions such as exclusion from participation in federal health programs, as well as criminal and civil penalties, including civil monetary penalties.

Anti-Kickback Statute

The federal Anti-Kickback Statute prohibits individuals and organizations like Lurie Children’s from knowingly and willfully offering or paying, directly or indirectly, any form of remuneration to induce or reward patient referrals or the generation of business involving any item or service payable by Medicare, Medicaid or any other state or federal health care financing program. Remuneration includes kickbacks, bribes or rebates and can take many forms besides cash, such as free rent, expensive hotel stays and meals and excessive compensation for medical directorships or consultancies.

Stark Law

The Stark Law prohibits physicians from referring Medicare or Medicaid patients for certain “designated health services” to entities with which the physician or immediate family members has a financial relationship unless an exception applies. Intent to violate the law is not required for a Stark Law violation to occur.
GIFTS AND BUSINESS COURTESIES

Accepting or offering gifts may improperly influence our business decisions or the decisions of others. We generally do not accept gifts of substantial value from anyone with whom we do business except in accordance with the Vendor Relations Policy. Perishable food items that are shared among staff or other small non-monetary gifts of nominal value (less than $15) are generally acceptable. Please contact the Office of Compliance and Integrity or the Legal Department if you have any questions on our policies and how they impact your work. *(Fraud Awareness, Prevention and Detection Policy)*

VENDOR SELECTION AND CONTRACTING

Vendors and suppliers are to be chosen based on quality and cost-effectiveness. Only individuals authorized under the Contract Review – Contract Execution Policy may enter into contracts on behalf of Lurie Children’s.

INFORMATION SECURITY

In the healthcare industry, there are many threats to confidentiality of information and the security of electronic resources vital to delivering on our mission. Lurie Children’s provides network access, e-mail accounts, electronic equipment and other resources to help us perform our work. Your vigilance in adhering to our information security policies and practices directly reduces potential harmful consequences to patient care and our organization.

Each of us makes decisions every day that affect the security of our systems and data. Key competencies and expected behaviors are our first line of defense:

- Protect your password; use a strong one and do not share it
- Only install/download approved software to your computer
- Know how to identify and report a potential phishing e-mail; use caution with links/downloads

CONFIDENTIALITY AND SECURITY

Any information about Lurie Children’s business operations, patients, families, employees or third parties, which staff may become aware of while doing their job, is considered confidential. All staff are always expected to be professional and keep this information confidential. *(Confidentiality and Non-Disclosure)*

IDENTITY THEFT

We take reasonable steps to protect patient data to guard against, detect and address identity theft. Be alert for “red flags,” which are patterns or activities that may indicate potential identity theft. If you suspect identity theft, alert the Office of Compliance and Integrity.

Potential “red flags” could include:

- A patient gets a bill for services not received
- Suspicious documents that look altered or forged
- Inconsistencies in personal information given

Questions or concerns? Visit hotlineservices.com or call 855.252.7606
BUSINESS AND FINANCIAL RECORDS
Honest recordkeeping demonstrates Lurie Children’s credibility and trustworthiness. We will use best practices and comply with all legal standards and internal controls to ensure complete reporting that accurately reflects our business activities. We never falsify, forge or alter any documents or misrepresent information contained in any medical, financial or operational record or report. (Fraud Awareness, Prevention and Detection Policy)

RETENTION AND DISPOSAL OF DOCUMENTS AND RECORDS
Departments should retain documents and records for the applicable retention period and should dispose of documents and records after expiration of the that period. Confidential records must be destroyed in a secure manner (such as shredding) so that the information cannot be accessed or used. Any documents that are the subject of actual or potential litigation must be retained. (Record Retention and Disposal Policy)

FRAUDULENT ACTIVITY
Lurie Children’s is dedicated to the prevention and detection of fraudulent activity, which can be any act, omission or misrepresentation that is intended to deceive others. We are also responsible for being alert for and reporting any suspected fraudulent activity, illegal acts or irregularities. (Fraud Awareness, Prevention and Detection Policy)

BILLING AND CODING PRACTICES
Inaccurate bills for services are subject to penalties, exclusion from government healthcare programs and refunds of overpayments. We strive for claims accuracy by taking the following actions:
• We only bill for medically necessary services that are actually provided
• We make clear, complete and timely entries in medical records that accurately reflect the services rendered
• We do not make false or misleading statements to obtain payment for services
• We assign correct billing codes for the services provided and do not upcode, unbundle or otherwise artificially enhance reimbursement
• We routinely review coding activities to ensure that compliant practices are being followed
• We promptly refund any overpayments that we identify

WHAT IF?
My co-worker gave me her badge and asked me to clock her in tomorrow morning because she was going to be late. Am I allowed to do this?
No. It is not permissible to falsify any operational records, including payroll records. Getting paid for time that is not worked is also considered theft. You should refuse the co-worker’s request and report this issue to your supervisor.

Questions or concerns? Visit hotlineservices.com or call 855.252.7606
FALSE CLAIMS ACT

Intentional false claims activity is subject to the federal False Claims Act and similar state laws that may impose civil and criminal penalties. These laws contain whistleblower provisions, which allow individuals with knowledge of false claims activity to file a lawsuit on behalf of the government and share in any recovery. Whistleblowers are protected by law against retaliation for reporting a violation. *(Deficit Reduction Act: Employee Education About False Claims Recovery Policy)*

COMPETITION AND ANTITRUST

We do not engage in any behavior that may restrict fair competition. For example, entering into agreements with or sharing data with our competitors related to price or wage fixing, market allocation or the boycott of suppliers or competitors is prohibited by law. *(Antitrust Compliance Policy)*

INELIGIBLE PERSONS AND ENTITIES

The federal and state government may exclude certain persons and vendors from participating in federal or state healthcare programs if they have engaged in certain kinds of misconduct. We cannot do business with or bill for services furnished by excluded persons.

All members of the Lurie Children’s workforce and vendors must not be excluded from participation in federal and state healthcare programs. Routine screenings are performed to ensure that these individuals and entities have not been prohibited from participation in these federal and state healthcare programs. *(Exclusion Screening Policy)*

HEALTH, SAFETY AND ENVIRONMENTAL COMPLIANCE

Regardless of our position, each person has an important role to play in maintaining a safe environment in which to work and provide high quality patient care. We comply with all health, safety and environmental requirements set by law, policies or accrediting bodies.

WHAT IF?

My supervisor asked me to submit claims using billing codes that do not match the services provided as documented in the medical records. When I told him my concern, he insisted that I use the incorrect codes. What do I do?

Report your concern immediately to the Hotline or the Office of Compliance and Integrity. Lurie Children’s can experience financial and reputational consequences for incorrect billing and coding, whether it was intentional or by mistake. *It is important that any incorrect billing practices are identified and corrected as soon as possible.*
PATIENT SAFETY

Patient safety is a top priority at Lurie Children’s, and fostering a true culture of safety in our organization is crucial. If you have identified any potential patient safety issue, you should submit an electronic report using the Safety Event Reporting System (SERS). Your report will help us learn how we can continuously improve our processes to prevent future safety events. ([Management of Safety Events Policy])

We do not perform our work without current valid licenses or credentials that are required by our job descriptions. We maintain evidence that our professional licensures, certifications and/or registrations are up to date. ([Licensure Certification and Registration Policy])

SURVEYS/INVESTIGATIONS

Lurie Children’s is subject to announced and unannounced site visits, inspections, audits, surveys and investigations by governmental and accreditation agencies. We are required to fully cooperate with these inquiries in an honest and accurate manner. We shall never wrongfully influence, obstruct or mislead an investigator or conceal/destroy information when responding to these inquiries. Notify your supervisor and the Legal Services Department immediately of any government investigation. ([Responding to Regulatory Investigations Policy])

ALCOHOL AND DRUG FREE WORKPLACE

Lurie Children’s is committed to an alcohol and drug-free work environment. Use of or impairment from alcohol, drugs that are illegal under federal and/or state law and drugs that are not lawfully prescribed or are not used in accordance with a prescription is not permitted while at work. Individuals may not work while using any prescribed drug that may cause them to be impaired. Employees are required to report use of legal drugs which may cause impairment while at work to Employee Health Services (EHS). EHS will evaluate for any potential safety concerns that could affect their ability to perform their job in a safe manner. ([Substance Abuse Policy])

PERSONAL USE OF ORGANIZATION RESOURCES

Organizational resources such as equipment, staff, time, materials and supplies are provided to make our jobs more efficient. We strive to use these resources in a prudent and effective manner. Lurie Children’s property and resources should not be used for personal gain or removed from the premises without approval from a departmental manager. Use of Lurie Children’s property, including internet and e-mail usage, may be monitored.
CHAMPION EQUITY

Treat everyone fairly, appreciate differences and make meaningful connections with each other to foster allyship and belonging.
EQUITY, DIVERSITY AND INCLUSION (EDI)

Lurie Children’s EDI Code of Conduct defines our unifying philosophy as follows:

**Equity**
Ensuring everyone has access to what they need to thrive, acknowledging unequal starting places and continually addressing and correcting the imbalance.

**Diversity**
The characteristics that make us who we are as people. For example, the ways in which we differ and are alike—our intersecting identities. “Diverse” is not an adjective for a person (e.g., diverse hire).

**Inclusion**
The intentional behaviors and organizational norms that support a sense of belongingness and honor individual uniqueness.

**Justice**
Deliberate reinforcement of systems, policies, practices, attitudes and actions that produce equity.

**Anti-Racism**
The practice of actively opposing racism and promoting racial equity.

CULTURE AND CLIMATE

Lurie Children’s is committed to a work and learning environment that supports a culture of equity, diversity and inclusion in which all individuals are treated with respect and dignity. Lurie Children’s strives to maintain an environment free from discrimination against individuals based on race, color, national origin, sex (including pregnancy), age, religion, disability, sexual orientation, gender identity and expression, genetic information or veteran status.

Each individual has the right to work and learn in a collegial atmosphere that promotes equal opportunities and prohibits unlawful discriminatory practices, including harassment. It is expected that interpersonal interactions will be professional and free of explicit bias, prejudice and harassment. External partners of Lurie Children’s (e.g., visitors, contractors, vendor representatives, etc.) are also expected to adhere to these principles.

WHAT IF?

I want to learn more about Lurie Children’s commitment to non-discrimination in hiring.

Policies and procedures are located on AllConnect under *Equal Employment Opportunity Policy*.
PATIENT RIGHTS AND RESPONSIBILITIES

Our patients and their families are considered members of our healthcare team. We respect their unique values and recognize their right to make informed decisions about care. They have the right to accessible, respectful and quality care in a safe environment. Refer to Patient Rights, and Responsibilities to learn more about our commitments to our patients and families.

PATIENT AND VISITOR NON-DISCRIMINATION

We are committed to providing the highest quality of clinical care, patient experience and service to all patients and families, regardless of sociodemographic characteristics such as ability, gender, race, ethnicity, color, religion, national origin, culture, ancestry, language, age, socioeconomic status, military status, order of protection status, citizenship status, immigration status, sex, pregnancy, sexual orientation, gender identity or expression, HIV status or disability to ensure equitable care experiences and outcomes.

PATIENT PRIVACY

Every day, our patient families entrust us with their care and expect that we will protect their privacy by keeping their health, financial and any other private information confidential. The collection of patient information is important to providing that quality care. We are committed to maintaining that trust by protecting their information in accordance with all applicable privacy laws and our privacy policies, which tell us how we can collect, access, use and disclose our patients’ information.

If you are not sure whether access, use or disclosure of patient information is appropriate, consult the Privacy Officer. They are here as a resource to help you do your job in a safe and compliant fashion. We each have a duty to report any known or suspected privacy incidents to the Privacy Officer at privacyoffice@luriechildrens.org or 888.607.6394.

For more guidance on how to handle patient information, see Lurie Children’s Privacy Policies.

WHAT IF?

A patient family member returned an envelope containing another patient’s discharge instructions that I had given to them by accident. I apologized and printed the correct instructions for them. Is there anything else I should do?

Yes. This is a privacy incident that must be reported to both your supervisor and the Privacy Officer. Privacy laws have strict timelines for how quickly we must respond to such incidents, so it is important to report it immediately.
EMERGENCY CARE AND EMTALA

Lurie Children’s follows the Emergency Medical Treatment and Active Labor Act (EMTALA) and provides emergency care regardless of a patient’s ability to pay. We provide a medical screening examination to any person (adult or child) who seeks or needs emergency care while on Lurie Children’s property. We do not delay this examination to ask about payment or insurance status.

In case of a medical emergency, call x4444 on the hospital’s main campus. All buildings not on the main hospital campus should call 911. *(EMTALA Policy)*

COWORKER INTERACTIONS

Lurie Children’s strives to create a work environment that promotes a team approach to patient care, encourages professional collaboration and respects the individuality of each team member. We display behaviors, language and interpersonal styles that demonstrate courtesy, dignity and respect in all our interactions. *(Communication Standards of Conduct Policy)*

HARASSMENT AND WORKPLACE VIOLENCE

Every person has the right to work in an environment free from bullying, harassment or the threat of harm. We are committed to the elimination of any discriminatory, harassing, coercive or disruptive behavior that creates a hostile or offensive workplace. *(Non-Harassment Policy and Workplace Violence Prevention and Response Plan)*

WHAT IF?

An adult comes into the Emergency Department complaining of chest pain. Since Lurie Children’s is a pediatric facility, should I direct him to a nearby adult hospital?

No. Under EMTALA, we must provide a medical screening to any person who seeks emergency care while on Lurie Children’s property, even if they are an adult.

WHAT IF?

My supervisor sometimes tells the team jokes that are sexual in nature. They make me uncomfortable, but I am afraid to tell him. What should I do?

Sexually-oriented behavior that makes you feel uncomfortable has no place in our work environment. You should report your supervisor’s actions to Human Resources, the Office of Compliance and Integrity or anonymously to the Hotline.
DISCOVER WHAT’S POSSIBLE

Embrace creativity and new ideas, continuously learn and improve and be a catalyst for positive change every day
INNOVATIVE RESEARCH

Lurie Children’s focuses on improving child health, transforming pediatric medicine and ensuring healthier futures for children through our innovative research. We follow the highest ethical standards and comply with all applicable laws, rules and regulations to protect research subjects and respect their rights.

PROPRIETARY INFORMATION/CONFIDENTIAL BUSINESS DATA

Information about Lurie Children’s business strategies and operations is considered confidential property of the organization and should not be shared outside the organization. Disclosure of this information is on a need-to-know basis for legitimate business purposes since inappropriate sharing can harm the organization. We should only share confidential business information in accordance with the Classification and Handling of Information Policy.

Materials created for Lurie Children’s are the property of Lurie Children’s. We respect all intellectual property rights and will follow all applicable laws, regulations and contracts that protect them. (Intellectual Property and Technology Transfer and Reproduction of Materials Subject to Copyright Protection)

FUNDRAISING

As a non-profit medical center, Lurie Children’s depends on donations to carry out our mission of creating a healthier future for every child. We conduct all fundraising activities in an ethical and honest manner. The Ann & Robert H. Lurie Children’s Hospital of Chicago Foundation coordinates all fundraising activities.

NOT-FOR-PROFIT TAX-EXEMPT ORGANIZATION

We are a not-for-profit tax-exempt organization under the Internal Revenue Code. As such, we are not organized or operated for the benefit of private interests. No organization earnings may financially benefit any private individual.

POLITICAL AND LOBBYING ACTIVITIES

As a tax-exempt organization, Lurie Children’s is prohibited from participating in political election and campaign activity on behalf of or against a candidate and is limited in its lobbying activities. Employees may not participate in or finance political activities in the name of Lurie Children’s or in their official capacity as a Lurie Children’s employee. Lobbying activities for the organization may only be conducted by authorized individuals. (Prohibition Against Involvement or Participation in Political Activities Policy and Lobbying Endorsements and Public Statements Policy)
MARKETING AND MEDIA COMMUNICATIONS

Marketing and advertising activities should be conducted in a truthful manner. We do not engage in any deceptive marketing practices.

We refer all media inquiries for information about the organization, its staff and patients to the Department of Public Affairs and Communications as outlined in the News Media and Multimedia Code.

SOCIAL MEDIA

Privacy and confidentiality, copyright compliance and workplace harassment policies apply to our personal online activities just as they do when we are at work. Confidential business information, including patient’s protected health information in any form, may not be shared online unless the required authorization is obtained. Copyrighted material may only be used with appropriate authorization. (Use of Internet-Based Social Media Policy)

WHAT IF?

A local news reporter calls asking for information about a patient who was a victim in a high-profile crime. What can I say?

Do not disclose any information about the patient or confirm whether they are being treated at Lurie Children’s. Refer this request and all media requests to the Department of Public Affairs and Communications.

WHAT IF?

We are having a birthday celebration for a patient on my unit. May I take a photo with my cell phone of the celebration and post it on my social media page? I see photos of patients all the time on the Lurie Children’s social media page.

No. To protect our patients’ privacy, we are prohibited from posting patient information, including photos, on our personal social media pages. Feel free to share posts from the official Lurie Children’s social media pages since patient families have given legal authorization for those images to be used.
COMPLIANCE AND INTEGRITY AT LURIE CHILDREN’S
THE ROLE OF THE COMPLIANCE AND INTEGRITY PROGRAM

Under the fiduciary oversight of the board of directors, Lurie Children’s has an established Office of Compliance and Integrity (OCI) to administer the Compliance and Integrity Program (the “Program”) in accordance with all applicable laws, regulations and guidance.

PURPOSE

The Program supports our commitment to the highest standards of honesty, business integrity and compliance with legal and ethical standards. Program activities give Lurie Children’s the opportunity to prevent, detect and correct non-compliant behavior by meeting the elements of an “effective compliance program” as set forth by the federal government.

Reporting Concerns

We each have a responsibility to report any actual or suspected instances of non-compliance with the Code, policies, procedures, laws or regulations. Retaliation against any person who makes a good-faith report of a suspected violation will not be tolerated.

You may raise concerns to your supervisor or directly to the OCI in any of the following ways:

HOTLINE

855.252.7606 | hotlineservices.com
- Available 24/7
- Option for anonymous reporting
- All reports are reviewed promptly & confidentially

OFFICE OF COMPLIANCE AND INTEGRITY

312.227.5288 | corporatecompliance@luriechildrens.org
I ACKNOWLEDGE THAT I HAVE RECEIVED, READ AND AGREE TO THE LURIE CHILDREN’S CODE OF CONDUCT.

I understand the following:

☐ Compliance with the Code of Conduct is mandatory.

☐ Non-compliance with the Code of Conduct is grounds for disciplinary action up to and including termination.

☐ I am responsible for knowing and complying with all standards applicable to Lurie Children’s and my employment or services, including laws, regulations, policies and procedures, accreditation standards and ethical principles.

☐ I am obligated to report any concerns regarding actual or potential violations of these standards.

☐ Lurie Children’s will not retaliate against me for reporting a concern in good faith or participating in an investigation of any potential violation.

Signature

Printed Name

Position

Department

Date

Questions or concerns? Visit hotlineservices.com or call 855.252.7606 | 22