

*Beaumont Hospitals'  
Code of Business and Ethical Conduct  
Corporate Management Policy 350*

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**Beaumont Hospitals®**

***Beaumont Hospitals' Code of Business and Ethical Conduct, Policy 350 effective 10/01/08***

***Combines several policies:***

350 Code of Business Conduct

351 Conflict of Interest/Disclosure of Remuneration

355 Conflict of Interest/Disclosure of Remuneration

356 No Endorsement Policy

***Adds new section on Vendor Relations***



*Relationships are integral in the advancement of medical science and the benefit of patients.*

- Conflicts of interest are inevitable
- Policy identifies, defines and prescribes management of various situations

*Let's look at the key changes. . .*



# *Definitions of Roles and Activities*

***Relevant roles and activities are defined in the beginning of the policy.***

***Who does this policy affect?***

**Beaumont designee – collectively refers to Clinicians and Non-clinicians**

- Clinician – hospital employees and trainees at all levels who provide services in conjunction with Beaumont
- Non-clinician – employed administrators, managers, support, clerical and technical staff, volunteers and others who comprise Beaumont Hospital's workforce

**Refer to policy for other definitions**

# *Political Activities*

Beaumont is prohibited by Federal Law from directly or indirectly participating in, or intervening in any political campaign on behalf of (or in opposition to) any candidate for public office.

There are legitimate business reasons for Beaumont to educate its designees and to educate and advise elected and appointed government officials regarding issues affecting Beaumont and the health care industry.

# *Continuing Education*

- Formalized programs sponsored by professional discipline
  - ▶ May receive commercial support
- Educational activities not supported by professional discipline
  - ▶ Commercial support may be submitted to the Beaumont Foundation. Nothing to be provided directly by vendor
- Industry interactions with trainees
  - ▶ Must be free of commercial interest

## *Fundraising/Solicitation*

- All fundraising and solicitation activities must be conducted under the directions of The Beaumont Foundation.

## *Beaumont as a Vendor*

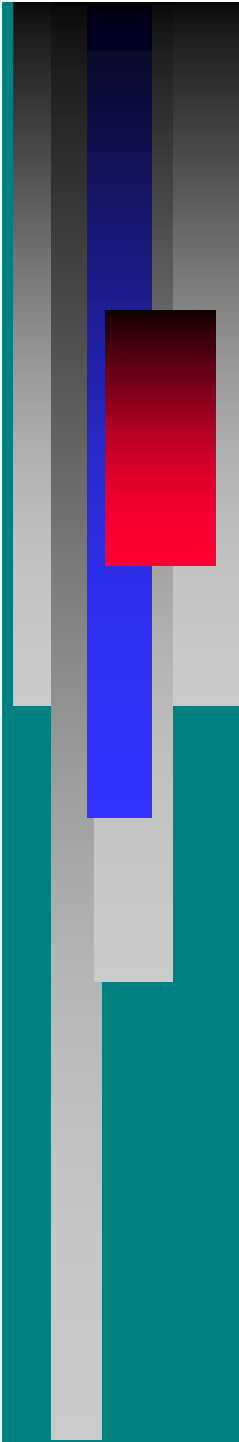
- In all cases it is expected that all Beaumont designees will adhere to Beaumont Marketing Policies. The policies of customers will also be adhered to and must be consistent with all laws, rules and regulations.

# *Conflict of Interest and Disclosure of Remuneration*


When a designee becomes involved in a relationship that is or may be a conflict of interest, the designee must complete the

Conflict of Interest/Disclosure of Remuneration Statement, Form (available on the Corporate Compliance Web Page)

and forward it to the Corporate Compliance Officer



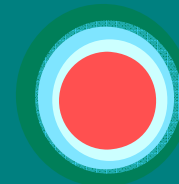
Beaumont designees must not incur or maintain any kind of financial or personal obligation or interest that affects their judgment in transacting business on behalf of Beaumont Hospitals with outside firms or individuals. Any relationship with a vendor that could be interpreted as influencing a designee's decision making on behalf of Beaumont Hospitals is prohibited.

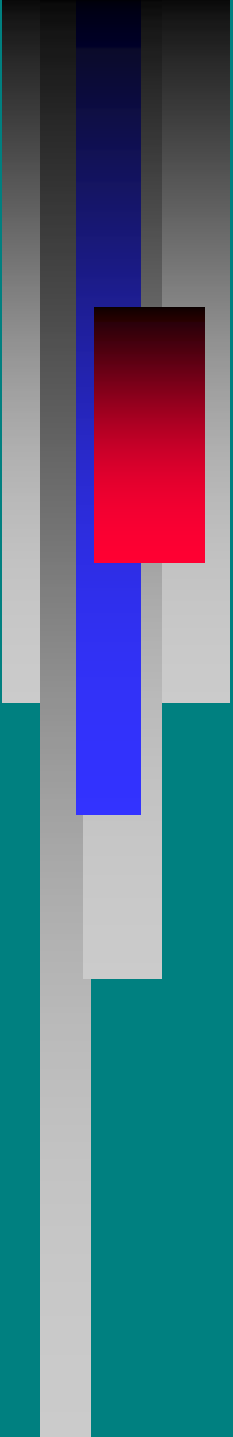


*Some of the items you need to disclose include:*

- Honoraria
- Advisory Boards
- Royalties
- Publications and Speaking
- Gifts and Entertainment


See policy for complete details





This slide presentation provides a summary of the changes to Beaumont Hospitals Code of Business and Ethical Conduct. Beaumont designees are bound by the entire content of the policy which can be found on the Corporate Compliance Web site. Questions regarding the policy can be directed to the Corporate Compliance Office via the Web site or by calling 248-551-0224.

***Submit a question via e-mail by going to the Corporate Compliance Web site  
– see following slides***



# Inside Beaumont *Online*

- [Documents](#)
- [Education](#)
- [Human Resources](#)
- [Departments](#)
- [Online Tools](#)
- [References](#)
- [Quality](#)
- [Service](#)

- [Management Resources](#) ▶
- [Clinical Resources](#) ▶

> [Corporate Compliance](#)

> [Coding & Billing](#)

> [Committees](#)

[Compliance Audits](#)

[Contact Us](#)

[Corporate Compliance Team](#)

[Department Compliance Coordinator Documents](#)

> [Department Compliance Plans](#)

[Department of HHS](#)

> [Documents](#)

> [Education and Communication](#)

[Frequently Asked Questions](#)

[HIPAA/Confidentiality & Security](#)

[MC Strategies](#)

[Physicians](#)

> [Policies/Documents/Forms](#)

[Prospective Payment System](#)

## Corporate Compliance

### Message from the Corporate Compliance Officer



Welcome to the Corporate Compliance Web Site. The Corporate Compliance web site provides resources to assist in compliance with the many laws and regulations affecting Beaumont's operations.

**Doing the Right Thing for the Right Reason**

### Revisions and Additions to Policies 314-Confidentiality and Disclosure of PHI & 358-Information Security



When did you last read the Confidentiality and the Information Security Policies? They have been revised in significant ways. Some of this

information may seem familiar, some new, but it is all worth repeating. The key revisions or additions include: All information on Beaumont systems is the property of Beaumont Hospitals. Members of our community should have any expectation of privacy in the contents of such systems. Beaumont communication systems, telephone, GroupWise, Internet, computer systems, smart communication devices, etcetera, are intended for Beaumont business purposes only.

Protected Health Information (PHI) is individually identifiable information. PHI includes written documents, electronic files, verbal information and photographs. Recordings include photographs, videos, audio (information from an informal conversation can be considered PHI). E- PHI is PHI transmitted by electronic media and/or maintained in electronic media.

Licensed or registered health care professionals may share PHI with the individuals listed below if, in the professional's judgment it can be reasonably inferred, based on discussions with the patient, that the patient does not object or unless otherwise directed by the patient or the physician not to disclose PHI.

### What's New

- [Read All the Latest](#)

### Compliance Line

1-888-495-5100

### [Policy 350 Code of Business and Ethical Conduct Resource Page](#)

[Ask a question](#)

### New Employee Requirements to Complete Orientation



Each new hire orientee beginning with the March 26, 2007

**Onboarding orientation MUST COMPLETE their [Mandatory Student Learning Center](#)**



# Inside Beaumont Online

Documents Education Human Resources Departments Online Tools References Quality Service

Management Resources  
Clinical Resources

- > Corporate Compliance
- > Coding & Billing
- > Committees
- Compliance Audits
- Contact Us
- Corporate Compliance Team
- Department Compliance Coordinator Documents
- > Department Compliance Plans
- Department of HHS
- > Documents
- > Education and Communication
- Frequently Asked Questions
- HIPAA/Confidentiality & Security
- MC Strategies
- Physicians
- > Policies/Documents/Forms
  - Resources for Code of Business and Ethical Conduct Policy
  - Prospective Payment System
  - Recovery Audit Contractors (RAC)
  - Web Sites
  - What's New

## Resources for Code of Business and Ethical Conduct Policy

### Policy 350

- [Code of Business and Ethical Conduct, 10/01/2008 \(pdf\)](#)

### FAQs

### Frequently Asked Questions and Responses

### Ask a question

### Tool Kit for Facilitators

- [Summary of Major Changes \(pdf\)](#)
- [Why Were the Policies Revised? \(pdf\)](#)
- [Examples/Scenarios and Responses \(pdf\)](#)



#### Web Sites

Beaumont Hospitals  
Beaumont Pressroom  
Groupwise On-line  
myDeveloper Login  
Password Self-Service

#### Locations

Campus Maps  
Hospitals  
Medical Centers & Facilities  
Nursing Centers

Select:  
Ask a question  
and the GroupWise message appears.  
Type your question in the message box and select **Send**.

