



PRIVATE DIAGNOSTIC CLINICS
Policies & Procedures

Policy #: 510.14	Title: Code of Conduct Policy & Procedure	Effective Date: 01/2001
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	Prepared by: N/A	11/2012, 3/2016

PURPOSE

The Private Diagnostic Clinic, PLLC (the "PDC") is committed to conducting its business ethically and in conformance with all applicable laws, regulations, and standards. To support this commitment, the PDC will maintain a written code of conduct ("Code of Conduct") to provide guidance with respect to the PDC Compliance Program ("Compliance Program"). The standards set forth in the PDC Code of Conduct address specific issues related to reimbursement, financial relationships, quality of care and other critical areas.

**POLICY or
PROCEDURE**

1. The PDC has developed and will maintain a written Code of Conduct to provide PDC Physicians, PDC employees, and others associated with the PDC, to include members of the Board of Managers and third party contractors, vendors, consultants and other service providers, with guidance on the PDC's expectations for workplace conduct and compliance with applicable laws and regulations. The current Code of Conduct is available in the Duke Health Policy Center on the [Duke Health Intranet](#).
2. The PDC Code of Conduct will describe important parts of the PDC Compliance Program such as the standards for conduct, problem resolution process, reports to the Integrity Line, and the PDC's non-retaliation/ non-retribution policy.
3. All PDC Physicians and employees, and other appropriate persons associated with the PDC will be provided a copy of the PDC Code of Conduct, and all PDC Physicians, other PDC employees, and members of the Board of Managers will participate in an education and training seminar that includes a thorough review of the PDC Code of Conduct as it applies to each person's responsibilities and duties.
4. The PDC has a number of Compliance Program policies which contain more detailed guidance and directives concerning such areas as billing and coding, conflicts of interest and governmental investigations. Such policies shall be made available for review by PDC Physicians, other PDC employees, and others



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associated with the PDC, to include members of the Board of Managers and third party contractors, vendors, consultants and other service providers.

PROCEDURES

The following procedures are to be followed:

1. The PDC Compliance Officer ("CO") is responsible for the development and periodic update of the PDC Code of Conduct.
2. The PDC Compliance Committee will be responsible for oversight and approval of the PDC Code of Conduct.
3. The PDC Board of Managers will be responsible for oversight and final approval of the PDC Code of Conduct.
4. The PDC Code of Conduct will be written at a basic reading level, avoiding complex language and legalese. At a minimum, it shall address critical areas such as compliance with laws and regulations, human resource practices, quality of care and service, conflicts of interest, proprietary rights, confidentiality, safety, and reimbursement practices.
5. The CO will ensure that all PDC Physicians, employees, and other appropriate persons associated with the PDC are given a copy of the PDC Code of Conduct. Copies will be provided to all new PDC Physicians and other new PDC employees as part of their orientation. The PDC's education and training program shall make every reasonable effort to ensure that every PDC Physician, employee, and member of the Board of Managers understands the nature of the PDC Code of Conduct and the basic principles of the PDC Compliance Program. All PDC Physicians and employees, and members of the Board of Managers shall sign an acknowledgment confirming that they have received a copy of the PDC Code of Conduct and agree to abide by its terms.
6. The CO will ensure that all PDC Physicians and other PDC employees receive training related to the contents of the PDC Code of Conduct to help them understand how to apply it to their particular situation and relationship with the PDC.
7. The CO will document which PDC Physicians and employees, members of the Board of Managers, and others associated with the PDC have received training regarding the PDC Code of Conduct. The CO will document which third party contractors, vendors, consultants and other service providers have requested training regarding the PDC Code of Conduct. The CO shall also keep a record of those PDC Physicians and employees, and others associated with the PDC, to include members of the Board of Managers, who have not received training.



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8. The CO will include in the CO's regular report to the PDC Compliance Committee, the status of training and education, along with recommendations for updating or improving the contents of the PDC Code of Conduct or the PDC Compliance Program training materials.
9. The CO is responsible for the investigation of suspected violations of the PDC Code of Conduct and ensuring proper enforcement of disciplinary action when necessary.