



Standards of Conduct

An employee guide to doing the right thing.

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Updated August 2019



From President and CEO, Chris Van Gorder



On the final day of our Scripps Leadership Academy classes, we often discuss the “Thirteen Things Leaders Need to Do Religiously.”

One of them reads, “Be true to your personal values and those of the organization.” Another says, “Be both honest and transparent at all times. Always tell the truth.”

Values and ethics are traits we should all review from time to time. We have an obligation to our patients, families, employees, physicians and the entire community to be true to our mission and to uphold the highest standards of integrity. For us, values can never just be words on paper.

We have a number of laws and internal policies, of course, that help us govern such behaviors, and that’s what the *Standards of Conduct* are all about. But in the end, it really comes down to monitoring ourselves and each other. As we say in our Principles, “we maintain the highest ethical standards, never approaching what could be considered questionable behavior.”

As you review our *Standards of Conduct*, I’d like you to consider how we apply these rules to what we do and what we decide each day. What ethical standards do we hold ourselves to when we care for patients and work with each other?

Perhaps more than any other industry, those of us who work in not-for-profit health care are subject to a standard of ethical conduct that the public has come to expect. Our patients simply expect us to always do what’s right, and we can’t let them down.

Everything we do at Scripps begins with trust, and it’s a trust we must constantly earn.

Thank you for everything you do.

A handwritten signature in black ink, appearing to read "Chris Van Gorder". The signature is fluid and cursive.

Chris Van Gorder, FACHE
President and CEO

Introduction

The *Standards of Conduct* reflect the clear commitment by Scripps Board of Trustees, leadership, physicians and employees to foster an atmosphere of integrity, honesty and compliance with all applicable laws and regulations. These *Standards of Conduct* serve as a primary education and communication tool for employees and volunteers that demonstrate how Scripps mission and values influence the way we provide patient care, conduct daily business, interact with each other, and make everyday decisions. Every individual at Scripps is responsible for upholding these guiding principles and for providing care and conducting business in a manner consistent with these standards.

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Scripps Mission and Values

Mission

Scripps strives to provide superior health services in a caring environment and to make a positive, measurable difference in the health of individuals and in the communities we serve.

We devote our resources to delivering quality, safe, cost effective, socially responsible health care services. We advance clinical research, community health education, education of physicians and health care professionals and sponsor graduate medical education.

We collaborate with others to deliver
the continuum of care that improves
the health of our community.

Values

We provide the highest quality of service.

Scripps is committed to putting the patient first and quality is our passion. In the new world of health care, we want to anticipate the causes of illness and encourage healthy behavior for all who rely on us for service. We teach and encourage patients to participate in their care and to make well-informed decisions. We will be their advocate when they are most vulnerable. We measure our success by our patients' satisfaction, their return to health and well-being, and our compassionate care for dying patients, their families and friends.

We demonstrate complete respect for the rights of every individual.

Scripps honors the dignity of all persons, and we show this by our actions toward one another and those we serve. We embrace the diversity that allows us to draw on the talents of one another. We respect and honor the cultural, ethnic and religious beliefs and practices of our patients in a manner consistent with the highest standards of care. All this is done in a compassionate setting. Our goal is to create a healing environment in partnership with all caregivers who are committed to serving our patients.

We care for our patients every day in a responsible and efficient manner.

Scripps serves as a major community health care resource for San Diego County and, as such, we are accountable for the human, financial and ecological resources entrusted to our care as we promote healing and wholeness. We begin from a base of excellence and collaborate with co-workers, physicians, patients and other providers to find new and creative ways to improve the delivery of health care services. All members of our community will have access to timely, affordable and appropriate care.



Our Principles

We Stand for Excellence

We are here to provide excellent health care. It's our mission. It is why we do what we do, and it's a promise we make to our patients, our community and each other. When people pass through our doors they trust us with their care or the care of a loved one — often when they are at their most vulnerable. Providing that care is an incredible responsibility, and an honor we never take lightly.

We know that excellence doesn't come easy. It requires caring, flexibility and collaboration. We don't work at this level because we're told to do so, but because we can't imagine ever doing it another way. In this sense, excellence is our personal mission. It's simply a part of who we are and how we behave. And, we are proud to hold ourselves and each other to this higher standard.

No matter what our specific role, we are all at Scripps to help others. We are empowered to make a difference in people's lives. And from that, great environments are built, great relationships are formed, and great care happens.

With this in mind, we hold ourselves accountable to the following principles.

1. We put our patients first.
2. We are accountable.
3. We maintain the highest ethical standards.
4. We actively participate in change.
5. We are thought leaders.
6. We are one team.
7. We have a greater mission.

Together with our mission and values, living by these principles creates an environment where we can deliver on our promise.

This is who we are. What we stand for. What we believe. In health care, it's what makes us different from all the rest.



Our Legacy

Our Legacy

The Scripps story began at the turn of the 20th century with the vision of two strong and determined women — Ellen Browning Scripps and Mother Mary Michael Cummings. Their pioneering spirit and commitment to the health care needs of a growing community led us to the Scripps Health we know today.

In their work, our founders were compassionate, ethical, accountable, innovative and courageous. These principles and others helped them to achieve their mission, and both would be proud of their legacy.

Today, their mission lives on in the thousands of employees, physicians, donors and volunteers who continue to provide and support excellent care and make our community a healthier place to live. It's the Scripps Health tradition of excellence for which we can be very proud.



Commitment to Our Patients and Community

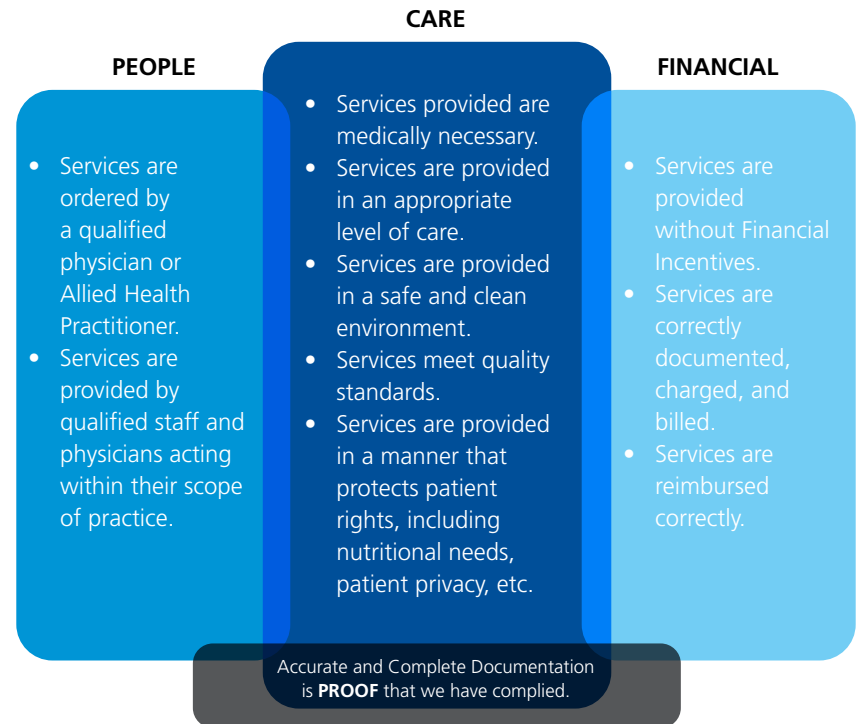
Ethical Conduct

Scripps has an ethical responsibility to the patients and community it serves. In carrying out the Mission and Values of Scripps, every employee, volunteer and business affiliate is expected to strive for the highest standards of individual and organizational conduct. Such conduct includes performing our respective roles in an honest and ethical manner in individual and business matters and being compliant with all laws and regulations that govern us.

Scripps is committed to fostering an atmosphere of integrity, honesty and ethical behavior. As part of that commitment, the Scripps Health Board of Trustees established a Corporate Compliance Program in February 1998 to guide the Board of Trustees and senior management in effective implementation of policies and procedures, oversight and monitoring processes, and effective communication mechanisms to help ensure an ethical culture.

Health Care Compliance Considerations

Health Care is complex, and health care compliance therefore has many aspects and processes to consider.



Health care is also a highly regulated industry. While employees, physicians and volunteers are not expected to be experts in the laws and regulations it is important they are aware of these key regulations that impact our day-to-day business and are the basis for many of our compliance-related policies.

Commitment to Our Patients and Community

Key Health Care Compliance-Related Regulations

- **Medicare Regulations** – describes the medical necessity, quality standards, and documentation and claims (billing) requirements for services paid by the Medicare program.
- **HIPAA Privacy and Information Security Laws and California State Privacy Laws** – governs how healthcare providers need to protect patient privacy and outline the penalties associated with a breach.
- **American Reinvestment and Recovery Act (ARRA)** – provided incentives for adoption of electronic health records, which materialized in the *Meaningful Use* requirements.
- **The Federal False Claims Act** – imposes penalties and possible fines on anyone who submits a fraudulent bill to the government. Also, the federal whistleblower statute prohibits retaliation against individuals who exercise their rights or obligations under the law. **Example of a violation:** *Knowingly submitting a claim that is coded incorrectly.*
- **The Anti-kickback Statutes** – prohibits individuals and companies from offering inducements (kickbacks) to or accepting kickbacks from anyone doing business with the government. **Example of a violation:** *Taking money for patient referral.*
- **The Stark Law (Physician Self Referrals)** – prohibits financial relationships with physicians except under one of several specific highly defined exceptions. Questions regarding the exceptions should be directed to Scripps Legal department. **Example of a violation:** *Giving financial incentives (e.g. cash, gifts, weekend retreats, etc. to physicians or family member for referrals.)*

Patient Care

When providing patient care, treatment and services at Scripps, we value our patients and respect their rights, family member and visitor, as well as members of the care team. This means:

- With patient approval, we involve family members and others in decisions regarding care, treatment and services.
- We learn about and respect individual cultural and spiritual values.
- We provide care and service in a way that safeguards personal dignity and self-respect.
- We strive to provide medically necessary services that meet each patient's identified needs.
- We support and advocate for our patients' rights, as reflected in the standards of professional practice and organizational policies.
- We always consider our patients' ability to meet the goals of the plan for care, treatment and services.

Patient Communications

Unanticipated Outcomes: Patients are entitled to information about the state of their health. This includes information on the outcomes of diagnostic tests, medical treatment and surgical intervention, whether the outcomes are expected or unanticipated. Sometimes, diagnostic tests or treatments result in unplanned or unwelcome outcomes. In these cases, disclosure of outcomes should be provided to patients by their physicians and/or appropriate administrative staff. Our philosophy at Scripps is one of transparent, open communication. Communicating and documenting unexpected outcomes is important to the continued care and treatment of our patients.

Commitment to Our Patients and Community

Marketing: In all of our marketing and public communication efforts, our objective and standard is to communicate fair and accurate information about Scripps and our capabilities. Our goal, through communications and marketing, is to accurately reflect the services we offer and specific licensure and accreditation of each of our facilities.

Financial: When presenting financial obligations and options to our patients, we are committed to being objective and fair. We act ethically in patient financial matters and strive to communicate effectively to assist patients in resolving their financial obligations. For this reason, information about the relationship between the use of services and financial obligations or Scripps interest is available to all patients and their families, clinical staff, physicians and other personnel.

Patient Privacy and Confidentiality

Our patients and employees have the right to expect that private information used and stored by Scripps will be protected and kept confidential. When patients choose Scripps for their care, they provide us with sensitive personal information. This can include names, addresses, phone numbers, social security numbers, medical diagnosis, family illnesses, genetic information, prescription histories and other personal information. Employees and all Scripps business affiliates must protect patient privacy and personal health information as they perform their day-to-day work. Private information should always be safeguarded from unauthorized use and disclosure. When sharing private information, you must verify that the recipient has the right and the need for the information, and that you are disclosing only the information necessary for the required purpose. The [Scripps Confidentiality, Patient Information policy](#) and other related health information policies provide additional guidance and details.



Commitment to Our Patients and Community



Serving Our Community

We serve the community by providing quality patient care, creating jobs and providing valuable health services. Our commitment to community health improvement also includes activities to raise public awareness of health care issues, provide for health education and prevention, and make health care services more accessible for those in need.

- **Uncompensated Care:** As a health care system dedicated to the community, Scripps is a necessary part of San Diego's health care "safety net," providing care to many who need it but don't have the ability to pay.
- **ScrippsAssists:** Scripps supports the ScrippsAssists employee volunteer club, comprised of Scripps employees and affiliated physicians who want to help make a difference in the health of our community.
- **Community-Based Health Improvement:** In addition to local health fairs, education, screenings and support groups, Scripps actively supports a number of community health programs, and established the Community Benefit Fund to provide financial support for initiatives that meet community health care needs and promote Scripps' mission and values.
- **Professional Education and Research:** Quality health care is highly dependent on health education systems and medical research programs. To this end, Scripps invests millions of dollars each year in professional training programs and clinical research.

A complete report on our community benefit efforts is available through the Scripps Community Benefit Office.

Commitment to Each Other

Offering a Great Place to Work

Our goal at Scripps is to provide employees with a great place to work — one where you trust the people you work for, have pride in what you do, and enjoy the people you work with. Our commitment is to regularly solicit employee feedback and suggestions, but that commitment cannot be one-sided. Your involvement and that of your peers is crucial to continually improving the workplace. Employee feedback is used to identify areas of improvement within departments and facilities. Our commitment to maintaining a great place to work has grown along with steadily increasing employee involvement. We're learning more about the workplace and workforce attributes that are important to employees and this information is used to help the organization plan and develop programs so that Scripps remains an employer of choice in San Diego.

Providing a Safe Place to Work

Scripps is committed to supporting a safe and fair workplace. Employees, Medical Staff, Allied Health Staff and other health care workers are actively encouraged and supported through the process of reporting unsafe practices and conditions. When non-compliance, near misses and errors do occur, every effort is made to respond fairly and without immediate judgment, and in an effort to improve the quality of care.

Unauthorized Substances in the Workplace. [*Scripps Unauthorized Substances in the Workplace policy*](#) states: "Scripps strictly prohibits the use, possession, sale, offer to sell, purchase, distribution or manufacture of illegal drugs or drug paraphernalia in any amount during work time, while on company business, or while on company premises. When reporting to work and while on the job, personnel must not have alcohol, illegal drugs (including cannabis) or their metabolites in their system. Violation of this policy may result in the termination of employment."

Although California recently legalized the recreational use of marijuana, since Scripps is an organization that receives federal funds for the care we provide, Scripps continues to fall under standards outlined in the federal Drug-Free Workplace Act, and marijuana is still illegal at the federal level. Additionally, please remember that California law prohibits smoking of marijuana in public locations, and smoking of any type is prohibited by Scripps on our campuses — including vaping. This applies to employees, physicians, patients and visitors.

All managers and employees should review the above policy in full, as it comprehensively covers all drug and alcohol use, including prescription drugs; pre-employment substance testing; reasonable suspicion substance testing; employee assistance and rehabilitation; and much more.

Commitment to Each Other

Workplace Violence Prevention Plan: Scripps Health works hard to provide a safe environment for everyone on its premises and will not tolerate acts or threats of violence, and/or intimidation that involve, or effect work or occur on Scripps Health premises. Anyone engaging in conduct that violates the *Workplace Violence Prevention Plan* and/or related policies is subject to action which may include written administrative disciplinary action and/or notification of law enforcement. Scripps Health endeavors to reasonably safeguard all persons on its premises from violence, threats, and/or intimidation by defining and mitigating inappropriate and unacceptable behavior; addressing threats and aggressive behavior at the earliest stage, as well as responding to, managing, and reporting acts or threats of violence or aggressive behavior. For more information, please refer to [Scripps Workplace Violence Prevention Plan](#).

Harassment-Free Workplace: Scripps is committed to providing a workplace free of harassment. A harassment-free workplace includes a work environment that is free from disruptive or inappropriate behavior that may intimidate staff or impact morale. This includes sexual harassment as well as harassment based on factors such as gender, pregnancy, race, color, religion, national origin, ancestry, age, physical disability, mental disability, medical condition, marital status, sexual orientation, family care leave status or veteran status.

Harassing conduct can take many forms and includes, but is not limited to, slurs, jokes, statements, gestures, pictures or cartoons regarding any or all of the types of unlawful harassment identified above. Scripps strongly disapproves of and does not tolerate harassment of employees by managers or co-workers. Similarly, Scripps will not tolerate harassment of its employees by non-employees or any person with whom Scripps employees have a business, service or professional relationship (such as customers, patients, physicians and/or vendors). For more information on Scripps anti-harassment policies, please refer to the [Scripps Harassment-Free Workplace policy](#).

Employee Assistance Program

In an effort to support and improve the quality of work life and work-life balance, and in recognition of the value our employees bring to our organization, Scripps established the confidential Employee Assistance Program (EAP) to help employees and their family members cope with stressful situations and problems at work and at home. Services provided by licensed EAP counselors are free, and EAP referrals to other programs may be covered under medical or mental health insurance plans. Employees, physicians, volunteers and their family members are eligible for EAP services immediately upon their date of hire.

Commitment to Good Business Practices

Conflict of Interest and Conflict of Commitment

The potential for conflicts of interest and commitment exist for decision-makers at all levels. To avoid conflicts of interest and commitment, you should never use Scripps resources for personal or non-Scripps business. Likewise, you are expected to report any situation that may create a potential or perceived conflict with your job responsibilities and should, of course, not take actions that would be cause for unfavorable publicity or embarrassment when disclosed.

To ensure understanding of the [Scripps Conflict of Interest and Conflict of Commitment policy](#), all employees are required to attest that they reviewed the policy as part of the new hire process. In addition, all management personnel (supervisors and above), individuals in purchasing and contracting functions, and others designated by Scripps Conflicts and Business Practices Review Committee are required to complete and sign a Conflict of Interest/Commitment Disclosure Form on an annual basis.

Additionally, management personnel have an obligation to counsel their staff regarding potential conflicts of interest or commitment, and to bring potential issues to the attention of the Conflicts and Business Practices Review Committee.

Business Courtesies and Entertainment

Employees should never accept cash or cash equivalents (gift certificates, gift cards, checks, stocks, bonds, etc.) from a third party. If a patient, family member, vendor, physician or other third party offers a cash or cash equivalent gift, the employee should promptly refer the individual to the department manager or appropriate Scripps Health Foundation Office where arrangements for a donation to Scripps can be made.

Gift, gratuity, entertainment or favors that are not in the form of cash or cash equivalent are acceptable provided they comply with the thresholds outlined in the policy and do not individually or in aggregate, influence or appear to influence the exercise of independent and objective judgment.

The policy outlines additional restrictions for individuals who refer federally funded individuals or who provide care in a home-based environment as well. Please refer to the policy, frequency asked questions, or the Conflicts and Business Practices Review Committee for direction or guidance.

Protection and Use of Scripps Resources

Scripps entrusts employees with numerous company assets and resources, including financial assets, facilities, computer and network resources, equipment, materials and supplies. These and other assets are maintained for Scripps' business purposes and benefit. As an employee, you are responsible for protecting these assets from loss, damage, misuse or theft.

Commitment to Good Business Practices

Information Security and Safeguards

At Scripps, information security and privacy is a top priority. Our patient care and business operations increasingly depend on the integrity, reliability and availability of electronic data and images that are housed, processed, and exchanged on Scripps information systems and networks. If our clinical, financial or proprietary information is not safeguarded properly, patient care, business operations and our ability to meet regulatory requirements could be seriously compromised. The way we secure our information has a direct impact on our reputation, operational success, regulatory compliance and ability to do business. Employees are responsible for learning and following these safeguards:

- Never share your user identification or password.
- Never access medical records, patient information or other computer information unless you are authorized to do so in order to perform your specific job duties.
- Always lock or log off your computer when leaving it unattended.
- Never download software or internet programs without prior authorization.
- Never remove data files from the workplace without your supervisor's approval – especially files containing protected health information or personal financial information.

- **Avoid Network Security and Email Phishing scams:** These scams send authentic-looking emails that try to trick a User into giving away his/her User ID and password. Protect your Scripps User ID and password as follows:
 - Do not follow unsolicited web links in email messages or submit any information to web pages in links.
 - Do not enter your Scripps User ID and password within a web link that was embedded in an external email.
 - Do not use your Scripps User ID and password for personal email, Facebook, Twitter or other personal accounts.
 - Use caution when opening unfamiliar email attachments.
- **Immediately report any suspicious events:** this includes (but is not limited to) a phishing attempt (see above), a compromised password, a Ransomware event, or other unusual activity. Report to your supervisor and directly to the Scripps HelpDesk **858-678-7500**.
- **Immediately report any privacy incidents:** this includes a suspected privacy breach, including inappropriate access. Report to your supervisor and directly to the Scripps Privacy Office **858-678-6819**.

Remember, your access to Scripps electronic systems is a privilege you retain through your responsible compliance with [Scripps Computer, Network, and Email Usage policy](#).

Commitment to Good Business Practices

Communication with Media

Information reported in the news media can affect Scripps reputation and it is therefore critical that we present information to the news media in a clear, accurate, positive and professional manner.

As one of the largest health care delivery systems in San Diego County, Scripps receives numerous inquiries from the news media, which can include local and regional newspapers, magazines, radio or television. To ensure the release of factual and accurate information, if you are approached by the media for information or comment, you must contact the Marketing and Communications Department at your facility, or call the general Scripps Marketing and Communications department number 858-678-7175 or after normal business hours call the on call pager at 858-494-2574. This requirement applies to all media inquiries and requests regarding patients, services, fees, employment matters or other organizational matters and practices and includes:

- Responding to calls from the news media
- Release of patient information
- Conducting and/or calling the media about a Scripps story or news item
- Publishing an article about Scripps services or patients
- Conducting interviews with media at public events, exhibits or conventions, or endorsing a product or company that is currently associated with Scripps
- Endorsing written marketing materials or free or paid advertisements on behalf of Scripps

Communication with Government Officials

It is Scripps' policy to fully cooperate with all government agencies, while protecting the rights of the organization, our employees and patients. Guidelines for the proper, accurate, and timely response by Scripps in the event of an unanticipated inquiry or investigation by a government agency, including subpoenas and search warrants, have been developed and are included in [*Scripps Responding to Investigation/Inquiry by Government Agency policy*](#).

Communication with the Public

Employees who are experts in a certain area or who are executive management may be asked to act as a spokesperson on behalf of Scripps in certain situations or for certain events. These people are selected and trained for this role. Otherwise, when having discussions with the general public, public interest groups, professional organizations, etc. it is important to make it clear that you are not a spokesperson for Scripps and your opinions or comments are your own.



Doing the Right Thing

Values Based Decision Making

As employees of Scripps, we are all expected to make good decisions that align with Scripps Values and Mission. When facing a difficult decision at work, employees can ask themselves the following:

- Are my actions aligned with Scripps values?
- What is the action that would be in the best interest of Scripps and our patients?
- Are there relevant Scripps policies that will provide direction?
- Am I being fair and honest?
- Am I making a choice that is safe for patients and co-workers?
- Have I considered all the parties that will be impacted by my decision?
- Would I be able to explain and justify my actions if challenged?

Remember that discussing a situation with your supervisor, or another member of management, is always a good option for decision making.

Reporting Concerns and Asking Questions

As a member of the Scripps organization, you play an important role in our Corporate Compliance Program. All persons, regardless of their position or employment status, are expected to become familiar with and act in accordance with these *Standards of Conduct*, and the laws and regulations that affect the performance of their jobs. If you ever have questions or concerns regarding the *Standards of Conduct*, a law or regulation, safety, quality of care, or any Scripps policy or practice, we encourage you to discuss it with your supervisor or department manager.

If you become aware of a situation where legal compliance is in question, patient or employee safety is concerned, unfair business practices are occurring, or the reputation or integrity of the Scripps organization is

being compromised, you are required to make it known so that Scripps may investigate and resolve the issue. You need to immediately report these types of concerns to your supervisor or another member of management, or directly to Corporate Compliance Department **858-678-6810**, or to the Scripps Compliance Alertline (see next page). Concerns related to safety or quality of care may also be reported directly to The Joint Commission by mail, fax or email. Visit [jointcommission.org](https://www.jointcommission.org) for more information.



Doing the Right Thing

Scripps Compliance and Patient Safety Alertline

A confidential “hotline” called the Scripps Compliance and Patient Safety Alertline has been established to provide a simple, risk-free way for you to report compliance or business practice concerns. The Scripps Compliance and Patient Safety Alertline is available toll-free, 24 hours a day, 7 days a week at 1-888-424-2387. The Scripps Compliance and Patient Safety Alertline is also available via a web portal that is accessible internally through a secure link provided on InsideScripps.org on the “Report a Concern” compliance webpage and is also found on the Tools and Apps page. Reports can be made anonymously to the Scripps Compliance and Patient Safety Alertline.

Protection Against Retaliation

Both federal and California law provide protection against retaliation for an individual’s exercise of his or her rights under the law. Federal Law: The Deficit Reduction Act provides whistleblower protections with respect to preventing and detecting fraud, waste, and abuse in federal health care programs. The False Claims Act (31 U.S.C. section 3730(h)) is the federal whistleblower statute that prohibits retaliation against individuals who exercise their rights or obligations under the law.

Regardless of the method you choose to report a concern, our follow up processes are designed to ensure confidentiality, integrity and objectivity for prompt investigation and resolution of all reported concerns. Scripps will not tolerate retribution or retaliation against any person, who in good faith, reports a compliance violation or concern. Scripps will make efforts to protect your identity to the extent allowable by law. Of course, anonymity cannot be protected if individuals identify themselves or provide information that can be used to identify them. See [Scripps Compliance Program policy](#) for more information.

Non-Compliance has Consequences

Non-compliance with the *Standards of Conduct* or Scripps policies and procedures can damage the reputation and image of Scripps. In certain cases, violations of the *Standards of Conduct* or Scripps policies could subject our organization, as well as individuals, to civil and/or criminal penalties. All employees will be held accountable for failing to comply with the *Standards of Conduct*, Scripps policies, or federal and state laws, statutes and regulations. All members of management are also accountable for the actions of their direct reports if they have not kept them appropriately informed or trained in specific requirements of their workplace, or have not provided proper counseling when problems have occurred. Corrective action, up to and including termination, will be consistently applied for all employees involved in non-compliance.





Corporate Compliance Program

The Scripps Corporate Compliance Program provides guidance for:

- Policy and procedure development and implementation
- Oversight and monitoring processes
- Communications including Scripps Compliance and Patient Safety Alertline
- Education and training
- Ethical business practices
- Best practices for effective and efficient compliance processes
- Corporate integrity and workplace culture development

Corporate Compliance Department

Scripps Compliance/Privacy Team's purpose is to protect and safeguard the organization and our patients by successfully implementing effective compliance and privacy programs that support an ethical culture and principles of integrity when providing patient care and conducting business.

Compliance Webpages on ScrippsConnect

Scripps' intranet contains a [Compliance and Privacy Program](#) section, which can be located under "Departments," clicking on Audit, Compliance and Risk Services. Audit and Compliance Services has developed and maintains this website as a resource for all Scripps staff. The site contains specific information about Audit and Compliance Services, the Compliance and Privacy Program, Internal Audit and Information Security Program, as well as education materials and other key compliance resource links.

Scripps Compliance Resources

Scripps Policies and Procedures

While the *Standards of Conduct* provide the foundation principles for how care is provided and business is conducted, *Scripps policies and procedures* provide detailed explanations and direction that help to communicate expectations, guide clinical practice, and ensure compliance with state and federal laws and regulations, licensure requirements and accreditation standards. These policies and procedures have also been developed in accordance with Scripps' mission and values. Each policy and procedure is carefully developed to reflect our shared commitment to excellence in all we do.

As with the *Standards of Conduct*, every individual at Scripps is responsible for knowing, understanding and following the policies and procedures that apply to the job they perform, the behaviors they exhibit on the job, or the specific task at hand. Policies also provide guidance to leaders and staff on critical compliance issues and are an important element of our Corporate Compliance Program. Scripps policies and procedures – including those that are compliance-related – are accessible in the [Intranet policy library](#). The online policy library is indexed by category and name, and also includes a keyword search capability.

