

# **LABORATORY STANDARDS OF CONDUCT**

## **JOHNS HOPKINS MEDICAL INSTITUTIONS**

Department of Pathology

Carnegie 417

600 North Wolfe Street

Baltimore, MD 21287

### **MISSION**

Our Mission is to provide the highest level of laboratory diagnostic services to our patients, under the direction of their physician.

### **VISION AND IDEOLOGY**

Our Vision and Core Ideology is to share with our clients a zeal for perfection, and the diligent pursuit of that perfection – delivered with uncompromising compassion – is paramount. Laboratory medicine will be practiced with accuracy, integrity, and high ethical standards, establishing a professional environment for the practice of clinical laboratory science for our staff and associates. Our most important responsibility will always be to our patients.

### **OUR CORE VALUES**

We are employees of the Department of Pathology at Johns Hopkins Medical Institutions, and we will promote the highest quality of care and adhere to our organization's policies and procedures at all times. We adhere to performance standards which ensure the delivery of superior health care services.

### **ETHICAL DECISION MAKING**

The laboratory staff is committed to attaining the highest level of integrity, compliance and ethics. This is evidenced in our daily work and our decisions. Specific expectations relating to integrity, compliance and ethics include, but are not limited to:

- ★ Respect for the patient
- ★ Generating and using confidential patient reports
- ★ High quality performance of laboratory testing
- ★ Adherence to all hospital and laboratory policies and procedures
- ★ Accurate billing of laboratory procedures
- ★ Determining when it is appropriate to raise an ethical issue

## STANDARDS OF CONDUCT

The following are general guidelines delineating the Standards of Professional Conduct, to which Johns Hopkins Pathology Department expects all laboratory staff to adhere. These standards apply whether or not the laboratory location routinely performs procedures compensated under any federal or state program.

These Standards are intended to summarize management's expectations. For a detailed explanation of any particular issue, consult the applicable laboratory or hospital policy, or contact a member of management.

### I. General Standards

- A. Laboratory staff shall, at all times, perform their functions with adherence to the highest ethical and professional standards of the laboratory profession.
- B. Johns Hopkins Laboratory staff shall adhere to all statutes, regulations and other program requirements governing federal, state and private health benefit plans, specifically including but not limited to Medicare and Medicaid. Johns Hopkins Laboratory management will provide all laboratory employees with the information and training necessary to comply with applicable laws, statutes and regulations.
- C. These Standards of Conduct are an integral part of the Laboratory Compliance Plan. It is imperative that all Laboratory employees are familiar with these Standards. Support of and adherence to these Standards is an essential element of each employee's job performance.
- D. These Standards of Conduct are not intended to be a moral guideline; it being the exclusive right of each individual to determine the moral guidelines under which they live. However, these Standards are intended to delineate the minimum conditions under which a laboratory employee must agree to perform professionally in order to continue employment with Johns Hopkins Department of Pathology.

### II. Orders:

- A. Laboratory staff shall perform procedures only on the order of health care providers licensed by the state of Maryland and who hold privileges on the medical and surgical staff of Johns Hopkins Medical Institutions or one of its affiliates.

- B. Laboratory staff specifically shall not perform procedures for friends, family, co-workers or others when such work is not accompanied by a *bona fide* physician's order.
- C. Laboratory staff shall not use personal discretion as a basis for performing additional work on any patient without a physician's order.

III. Coding:

- A. Every effort must be made to associate each test order received in the laboratory with diagnostic information provided by the physician. If the laboratory is required to convert narrative diagnostic information to an ICD-9-CM code, the code must be valid and accurately reflect the information in the medical record documentation.
- B. CPT or HCPCS codes used to bill laboratory tests must accurately describe the service that was ordered and performed.

IV. Billing:

- A. Billing shall be performed in accordance with organizational policy.
- B. Procedures will be billed only when they have been performed under the order of a physician or other individual authorized to order laboratory tests.
- C. The laboratories will only submit claims for tests that have been performed. If the laboratory cannot perform a test due to a laboratory accident, insufficient quantities or inappropriate specimen, the laboratory must not submit the claim. Credits for laboratory tests will be credited upon cancellation of test(s). Johns Hopkins Laboratory offers only HCFA-approved panels.
- D. Johns Hopkins Laboratory will not bill for both calculations and the tests performed to derive such calculations.
- E. Standing orders are honored by Johns Hopkins Laboratory as long as they are valid, medically necessary and monitored for appropriateness as required in the Laboratory Policies and Procedures.
- F. No service may be billed in a manner inconsistent with Medicare regulations, unless the patient is not a Medicare beneficiary and full disclosure of the billing exception is made to both the patient and the patient's attending physician.

V. Reporting of Results:

- A. Reporting of results shall be performed in accordance with established organizational policy.
- B. Results may be reported only to a member of the Johns Hopkins employee staff, who demonstrates a documented need to know, or to a physician or designee. Under no circumstances may results be reported directly to a patient, member of a patient's family, or a significant other to the patient. With consent from the patient, results may be reported to non-Hopkins personnel. Consult the Legal Department for assistance.

VI. Use of Johns Hopkins Medical Institutions' Resources

- A. Every Johns Hopkins employee is obligated to protect company assets. Company resources such as supplies, equipment, information and time should not be used for personal purposes.

VII. Reporting of Violations/Suspected Violations

- A. If any laboratory staff member believes activities or events are occurring, have occurred, or might occur, which would be contrary to the expectations reflected in this policy, it is the staff member's obligation to report such belief to a member of management or a member of the Compliance Committee.
- B. Violations of any aspect of Medicare regulations, or failure to report a known or suspected violation of such regulations, shall be grounds for disciplinary action.
- C. Whenever possible and appropriate, an attempt should be made to resolve issues at the local level first by addressing concerns to one's immediate supervisor. Under no circumstances is any employee discouraged from contacting another member of management, a Compliance Committee member, or the Hotline if they are uncomfortable discussing the issue with a supervisor.
- D. If any laboratory staff member believes he/she would be placed in personal or professional jeopardy by reporting an actual or suspected violation to management, that employee is obligated to report such known or suspected violation to the Johns Hopkins Compliance Hotline at 1-877-WE-COMPLY (1-877-932-6675).
- E. Johns Hopkins will make every effort to protect the identity of an individual who reports misconduct. Retribution or discipline for anyone who reports a violation

or suspected violation in good faith is strictly prohibited. Any employee who deliberately makes a false accusation will be subject to discipline.

VIII. Miscellaneous

- A. All marketing related to laboratory services shall be honest, clear, fully informative and non-deceptive in nature.
- B. The conduct of business as a laboratory should reflect the ethical conduct of business in any venue. The intent is to treat others, whether government or non-government, as we would expect to be treated.
- C. When questions as to the appropriateness of any action arise, consult the Laboratory Compliance Plan, laboratory policies, Johns Hopkins policies, or any member of management.
- D. Any questions pertaining to these Standards of Conduct may be directed to your immediate supervisor, department head, or a member of the Laboratory Compliance Committee.

Johns Hopkins Medical Institutions  
Department of Pathology  
LABORATORY STANDARDS OF CONDUCT  
CERTIFICATION

I certify that I have received a copy of the Johns Hopkins Laboratory Standards of Conduct (Standards), adopted June 1999. I further certify that I have read and understand the entire contents of the Standards. I understand that adherence to all elements detailed in these Standards is an essential element of my job performance and that failure to comply with the Standards could be cause for disciplinary action.

Laboratory employee name \_\_\_\_\_

Laboratory employee signature \_\_\_\_\_

Date \_\_\_\_\_