

Policy Title	Code of Ethical Conduct-D-H	Policy ID	2347
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CODE OF ETHICAL CONDUCT

Preamble

The shared mission of Dartmouth-Hitchcock Clinic and Mary Hitchcock Memorial Hospital (together, “Dartmouth-Hitchcock” or “D-H”) is to *advance health through research, education, clinical practice, and community partnerships, providing each person the best care, in the right place, at the right time, every time*. The following core principles of ethical conduct represent values that support and serve this mission:

- Honesty, trustworthiness, and integrity
- Respect for the dignity of persons
- Teamwork and collaboration
- Respect for cultural and religious/spiritual beliefs
- Respect for property
- Respect for and adherence to the law
- Respect for the physical and emotional environment in which we work
- Personal responsibility and accountability for actions
- Stewardship of human, financial, and other resources
- Compassion
- Commitment to continuous improvement

These ethical principles inform a Code of Ethical Conduct (“Code”) which specifies behaviors that all individuals are expected to display who work, study, perform research, or who otherwise provide services at D-H, including its employees, professional staff members, volunteers, agents, consultants, and vendors, as well as medical, nursing, and other professional allied health learners (collectively referred to herein as “personnel”).

While the principles that underlie the Code apply to all personnel, certain portions of the Code are more frequently applicable in some disciplines than in others. For example, certain principles have direct application in clinical settings, while others are applicable to teaching, research, business or support/administrative activities.

All personnel at D-H are essential to our mission and are subject to the Code of Ethical Conduct. All professional staff members at D-H have additional ethical obligations that exceed legal and regulatory requirements by virtue of their professional training and because of their positions of responsibility. Professionals have responsibilities to those whom they serve, their colleagues, and the public.

The Code of Ethical Conduct is a series of principles and their subsidiary rules that govern all

interactions. The Code contains two key complementary sections: obligations and ideals. “**Obligations**” refer to *necessary* behaviors that are required by the ethical foundation of our organizational mission. “**Ideals**” refer to *desirable* behaviors to which all D-H personnel should aspire.

Failure to meet the obligations described in this Code represents a violation of the Code. Items marked with an asterisk indicate behaviors that may additionally constitute violations of federal or state laws. Alleged infractions of the obligations of the Code will be addressed in accordance with applicable D-H policies, procedures, and professional staff bylaws, including those addressing disciplinary and adverse actions.

For ease of obtaining further detail, when possible, the Code is cross-referenced to applicable D-H policies (cited in italics). These policies are connected to the Code, but kept separate because they may evolve over time.

As part of each individual’s obligation to maintain the highest level of integrity and accountability, each individual to whom this Code applies is required to alert a supervisor, senior management, the Office of General Counsel, Compliance and Audit Services, or the D-H Compliance Helpline 1-844-733-0094 of a suspected or actual violation of this Code, D-H policies and procedures, or applicable laws and regulations.

Obligations

1. Practice Respect for Persons

- a. Treat those whom you serve, with whom you work, and the public with respect and courtesy at all times.
- b. Treat patients and colleagues with kindness, respect, and dignity, and maintain psychological safety.
- c. Provide care that is both medically necessary and appropriate, include patient preferences for treatment in the plan of care to the fullest extent possible, and uphold the autonomy of patients or their designated surrogates in health care decision-making.
- d. Respect the privacy and modesty of patients.
- e. Do not use discriminatory, harassing, hostile, or profane language, verbally or in writing.
- f. Do not harass others physically, verbally, psychologically, or sexually.* If you experience or observe any incident of unlawful harassment, immediately report it to your supervisor or other appropriate person.
- g. Seek to resolve interpersonal conflicts, seek out conflict resolution resources as may be helpful, and do not allow interpersonal conflicts to interfere with patient care or the functioning of the organization.
- h. Ensure that all communication, including documentation in the patient medical record, is constructive and free of patronizing, judgmental, or hostile overtones.
- i. Practice discretion in patient care settings and other settings where conversations may be overheard.
- j. Do not discriminate on the basis of race, color, religion, sex, sexual orientation, gender identity or expression, pregnancy, age, genetic information, physical or mental disability, national origin, marital status, veteran status, citizenship, or any

other category protected by law.*

2. Maintain Patient Confidentiality

- a. Maintain the privacy of all patients in accordance with the Health Insurance Portability and Accountability Act of 1996, as amended (“HIPAA”), and other federal and state laws and regulations governing patient privacy and security, as well as D-H HIPAA Policies and Procedures.* *[Including: Reporting a HIPAA Privacy Incident Procedure #7252; The Dartmouth-Hitchcock Privacy Group Statement on the Privacy and Confidentiality of Patient Information Policy #7563].*
- b. Medical or personal details of a patient should be shared only with those health care professionals who have a bona fide “need to know”, such as the members of the patient’s care team or other individuals involved in an educational or research endeavor.*
- c. Staff may not access a patient’s health or other personally-identifiable information unless there is a professional “need to know”.*
- d. To the greatest extent possible, conversations regarding patients should be limited to private locations where the conversation cannot be overheard.
- e. Patients should not be publicly identified, verbally or in writing, without documented permission or adequate justification.*
- f. Do not invite or allow unauthorized persons to access patient care areas, or other locations in which private information is kept.
- g. Computer system passwords may not be shared and should remain confidential and secured.

3. Protect Confidential Employee and Business Information

- a. Do not share other employees’ personal identifying information acquired as part of your job duties, including information such as Social Security numbers, addresses, and other personally identifying information, unless the employee has authorized such disclosure, or the acquisition and disclosure of personal identifying information is part of your job duties.
- b. Do not disclose confidential non-public information about D-H that you receive or have access to in your role at D-H, unless such disclosure is part of your job duties.
- c. Follow D-H’s Social Media Policy [#514]. Posting details on social media platforms about specific job activities, patients (even if not identified by name), and other D-H matters could violate D-H confidentiality policies and procedures and privacy laws, even if you do not intend to do so.

4. Maintain Personal Honesty and Integrity

- a. Be truthful in all communications.
- b. Acknowledge personal errors and take steps to correct them and prevent their recurrence.
- c. Do not knowingly provide inaccurate, misleading, or deceptive information.
- d. Do not cheat, steal, plagiarize, or otherwise act dishonestly.
- e. When using information that is not your own in verbal or written communication,

- give proper attribution, including the sources and date.
- f. Use D-H-provided resources for their intended purposes and not for personal gain (e.g., personal phone calls should not be made at the organization's expense).
 - g. Be truthful in negotiations and business transactions.

5. Assume Responsibility for Patient Care

- a. Avoid engaging in unsupervised involvement in areas or situations where you are not adequately trained unless in an urgent or emergency situation.
- b. Obtain the patient's or authorized surrogate decision maker's informed consent for diagnostic tests or treatment and confirm the decisional capacity of the patient as appropriate.
- c. Take responsibility for the patients under your care and coordinate care; when off duty or on vacation, assure your patients are adequately cared for by another practitioner and provide a coherent and consistent treatment plan.
- d. Health care professionals must not abandon a patient. If you are unable or unwilling to continue care, you have an obligation to arrange for alternative care or assist in making a referral to another competent practitioner willing to care for the patient.
- e. Follow up on ordered laboratory tests and complete patient record documentation in accordance with D-H documentation policies. *[Including: Provider Documentation Policy #2168 and the Documentation Standards Policy-Nursing #972].*
- f. Charge patients or their insurers only for clinical services provided or supervised.*
- g. Provide the same standard of care to all patients regardless of their ability to pay.
- h. Comply with D-H's Substance Abuse and Drug-Free Workplace Policy [#476]. Report suspected drug misuse or diversion in accordance with applicable D-H policies and procedures *[Including: Compliance Issues Reporting Policy #884; Fitness for Duty Policy-Employees, Covered Individuals #511; How to Report Workplace and Compliance Concerns-Job Aid #1163].*
- i. Do not have romantic or sexual relationships with patients; if such a relationship seems to be developing, seek guidance, transition the patient's care to another appropriate provider, and terminate the professional relationship.*
- j. Cooperate with other members of the health care team, including providing appropriate and timely response to other members of the health care team.
- k. Honestly disclose consequential, unanticipated outcomes to patients and families in accordance with D-H's Communication of Unanticipated Patient Outcomes Procedure [#6537].
- l. Be accountable for the safety of our patients, peers, and ourselves. Share ideas for improving patient or organizational outcomes.
- m. Immediately report in accordance with the How to Report Workplace and Compliance Concerns-Job Aid [#1163], any serious workplace injury or dangerous situation so that immediate action may be taken to assure a healthy and safe environment.

6. Maintain Awareness of Limitations and Opportunities for Improvement and Strive to Improve

- a. Act in accordance with your authorized role and level of responsibility.
- b. Be aware of your personal limitations and deficiencies in knowledge and abilities, and know when and who to ask for supervision, assistance, or consultation.
- c. Know when and for whom to provide appropriate supervision.
- d. Report system problems or other concerns that may place patients or others at risk of harm.
- e. Assure that students have all patient workups and orders countersigned by the appropriate supervisor.
- f. Avoid patient involvement when you are ill, distraught, or overcome with personal problems, and seek out appropriate resources to address such problems, as may be helpful or necessary.
- g. Keep abreast of current research and professional, technological, and regulatory developments that relate to your work.

7. Practice Professional Deportment

- a. Clearly identify yourself and your role to patients and staff; wear your name tag. Do not misrepresent yourself or allow others to assume titles (such as “Doctor”) that do not belong to you.
- b. Dress in a neat, clean manner following local policies that govern accepted attire and make sure personal hygiene is maintained.
- c. Maintain a professional composure despite the stresses of fatigue, professional pressures, or personal problems.
- d. Do not engage in disruptive behaviors. Comply with the Disruptive Behavior of Employees Policy [#6587].
- e. Introduce all learners accurately and appropriately; for example, not as “Doctor” or “Nurse” when the individual does not yet have such a credential.
- f. If medical or professional decisions of colleagues appear questionable, discuss them with sensitivity in an appropriate setting.
- g. Conduct yourself in a professional manner whenever you are performing your job duties or representing the organization in a job-related capacity.
- h. When involved with federally sponsored programs, do not use your position for purposes that are, or appear to be, motivated by personal financial gain.
- i. Resolve professional disagreements through discussion conducted respectfully.

8. Avoid Conflicts of Interest

- a. As a general rule:
 - i. Refrain from conducting or entering into business, financial, or other relationships or transactions that conflict with the interests of D-H, or that conflict with your ability to perform your duties or compromise your professional judgment; and
 - ii. Do not engage in outside activities that hinder or interfere with your ability to perform your job at D-H or cause you to use D-H resources for other than permitted D-H purposes.
- b. Maintain objectivity in decision-making and avoid real and perceived conflicts of interest. The Office of General Counsel, Compliance and Audit Services, and the D-H Organizational Ethics Committee are available resources to assist with

- questions pertaining to conflicts of interest.
- c. Follow D-H's Conflicts of Interest Policies, including institutional policies regarding timely disclosure of real or perceived conflicts of interest.
 - d. Avoid conflicts of interest, but should a conflict of interest arise, always resolve a conflict in favor of the patient.
 - e. Comply with the current conflict of interest, federally sponsored programs, and other applicable policies regarding selecting vendors and other potential business partners on the basis of objective criteria including quality, price, and service, and prohibiting participation in contract negotiations that would benefit you or family members and/or activities that are or could be perceived as a conflict of interest.
 - f. Make patient referrals for services or products on the basis of independent medical judgment and patient preference.
 - g. Comply with D-H policies prohibiting the solicitation or acceptance of personal gifts, business courtesies, or services from outside entities, vendors, or business associates. [*D-H Conflict of Interest Personal Gifts including Meals, Travel, and Education Policy #2846; D-H Conflict of Interest Consulting and Vendor Sponsored Activities Policy #2845; D-H Conflict of Interest in General Business Affairs Policy #2701*].

9. Assume Responsibility for Personal Behavior and Peer Behavior

- a. To protect our patients, colleagues, business partners, vendors, and other third parties, D-H maintains an alcohol and drug-free work environment. [*See Policy entitled, "Substance Abuse and Drug-Free Workplace Policy #476"*].
 - i. Take the initiative to identify, report and, where appropriate, help rehabilitate impaired learners, physicians, nurses, and other employees. Available resources include the Geisel School of Medicine's Student Needs and Assistance Program, the D-H Employee Assistance Program, D-H Occupational Medicine.
 - ii. Comply with the Substance Abuse and Drug-Free Workplace Policy [*#476*] and seek immediate assistance from appropriate internal and/or external resources if you believe drug and/or alcohol use may impact your ability to perform your job at D-H.
- b. Report actual or suspected violations of the Code to a supervisor, senior management, the Office of General Counsel, Compliance and Audit Services, or the D-H Compliance Helpline at 1-844-733-0094.
- c. For instances of disruptive behavior that are of a minor nature, address such behavior in accordance with the Disruptive Behavior of Employees Policy [*#6587*].
- d. Behave in a consistently professional manner, and use feedback from patients and colleagues to improve.

10. Respect Personal Ethics by Permitting Appropriate Conscientious Refusal

- a. You are not required to perform or participate in procedures or medical care (e.g., elective abortions, termination of medical treatment) that you believe are unethical, illegal, may be detrimental to patients, or are contrary to your sincerely held religious beliefs.

- b. Staff members who decide to provide these procedures and medical care are entitled to respect from their colleagues and others, and should not be criticized for doing so.
- c. Staff members electing conscientious refusal have an obligation to inform patients and their families of available treatment options that are lawful and consistent with acceptable standards of medical and nursing care, and to assist with the transfer of care to staff members willing to conduct them.
- d. When no other staff member is available to care for the patient, conscientious refusers must continue to render appropriate care until another staff member can assume care of the patient.

11. Respect Property and Comply with the Law

- a. Protect the property of D-H and the property of patients, research participants, learners, employees, contractors, and others who work in or are being served by our facilities.
- b. Do not misappropriate, destroy, damage, or misuse property of D-H.*
- c. Do not use D-H computer and telecommunication resources for personal commercial purposes or financial gain, or to distribute content that would violate D-H policies [*such as the Appropriate Use of Computer Resources Policy #4623*].
- d. Adhere to the regulations and policies of D-H and Dartmouth College with respect to D-H personnel who are also faculty members, employees, or students of Dartmouth College/Geisel School of Medicine.
- e. Adhere to local, state, and federal laws and regulations. Understand how laws and regulations apply to your work. Seek out guidance from supervisors where necessary.
- f. Comply with the CMS anti-kickback statute and other fraud and abuse laws. Conduct all business dealings with referral sources in accordance with applicable laws and regulations, including ensuring fair market value transactions are negotiated at arm's length. D-H policy prohibits accepting, soliciting, or providing an improper payment, gift, service, or other item of value ("kickback") offered or received in return for increased business such as patient referrals.
- g. Comply with the False Claims Act. Document patient care completely, accurately, and in a timely manner. Perform billing and claims payment processes in a manner consistent with Federal health care program and other payor requirements, and in accordance with D-H billing policies and procedures.
- h. Report actual or suspected incidents of fraud, waste or abuse in federal health care programs to your supervisor, senior management, the Office of General Counsel, Compliance and Audit Services, or the D-H Compliance Helpline at 1-844-733-0094. Reports may be made anonymously and without fear of retaliation.

12. Maintain Healthy Teacher-Learner Relationships

- a. Be knowledgeable about the subject material you are teaching.
- b. Create and nurture a collegial environment in which learners are valued and respected.
- c. Foster learners' professional growth, lifelong learning, and ethical behavior.
- d. Encourage intellectual curiosity and rigor.
- e. Encourage academic freedom and integrity.

13. Maintain Trust and Integrity in Research

- a. Respect the autonomy and promote the dignity of each human research participant; ensure just treatment of and appropriate protections for those whose autonomous decision-making may be diminished or impaired; design research to minimize potential harm and maximize potential benefits for each human participant.
- b. Ensure that when research involves human subjects, the study protocol/plan is approved by the D-H Institutional Review Board (IRB) – the Dartmouth College Committee for the Protection of Human Subjects.
- c. Obtain informed consent prior to human subject participation in research based on providing adequate information for decision-making to each potential participant.
- d. Reduce the potential for pain and suffering of research animals to an extent consistent with humane treatment.
- e. Protect the integrity of scientific study design, data collection, interpretation, and conclusions.
- f. Report the results of research honestly in scientific and scholarly presentations and publications, and without exaggeration to the public and the media.
- g. Attribute proper credit to colleagues and others who contribute to the research when publishing and presenting reports of results. Accept co-authorship attribution when consistent with the International Committee of Medical Journal Editors (ICJME) criteria for authorship.
- h. Recognize that intellectual property has value and respect the ownership rights of others.
- i. Avoid conflicts of interest in research activities and candidly disclose sources of income, ownership of equity, and any other relationship that produces or could be perceived to produce a conflict of interest.
- j. Encourage the free sharing and collegial exchange of research results; foster cooperation and collaboration among research team members.
- k. Comply with all applicable laws and regulations pertaining to research, including without limitation those applicable to human subjects protection and federally sponsored programs research, and comply with all research-related policies and procedures of D-H and, to the extent applicable, of Dartmouth College.

14. Practice Financial Responsibility

- a. Adhere to laws and institutional policies to protect, spend, and account for money and resources to which you are entrusted. [*Including: Business and Travel Expense Policy #10897; Donated Funds Management Policy D-HH #10045*].
- b. Do not offer or accept bribes, kickbacks, or other inducements that may influence a decision, such as the purchase of products and services or patient referrals.*
- c. Adhere to all laws, regulations, and D-H policies and procedures in spending and accounting for grants and contracts.*
- d. Adhere to accepted laws and regulations governing fair and ethical billing and collection practices and submission of claims for health care services, including without limitation D-H's False Claims Act Policy [#866]. *
- e. Adhere to accepted accounting standards for records and reporting.* Create and

maintain accurate financial records; never falsify or improperly alter information in any records, reports, or other documents.

- f. Adhere to all applicable laws and regulations and D-H policies and procedures with respect to charitable donations. *[Including the “Donated Funds Management Policy D-HH #10045”]*.

15. Promote Personal and Environmental Health and Safety

- a. Adhere to institutional policies and procedures and accepted practices governing the safe use of chemicals, drugs, equipment, and products in the workplace. *[Including: Hazardous Chemical Communication Policy #95; Safety Management Plan #7179; Personal Protective Equipment and Work Clothing Policy #649]*.
- b. Adhere to institutional policies and procedures governing health screenings and immunizations. *[Including the policy entitled, “Influenza and Other Immunization Requirements and Exemption Policy #174”]*.
- c. Use required precautions to safely perform your duties and protect your coworkers.
- d. Assure that your physical and mental health render you fit to work. Alert your supervisor immediately if you believe you may not be fit to work, and seek out appropriate resources to assist you as necessary.
- e. Promote a healthy work environment.
- f. Report system problems, incidents, or concerns that may place patients, employees, or others at risk of harm.

16. Promote Diversity, Equal Opportunity, and Respect in the Workplace

- a. Practice the principles of equal opportunity and non-discrimination.
- b. Promote an atmosphere in which we can discuss concerns about diversity and equal opportunity without fear of retaliation or retribution.
- c. Maintain dignity and respect for all persons.
- d. Discuss and resolve disagreement in the workplace in a professional manner consistent with the Disruptive Behavior of Employees Policy *[#6587]*.

17. Follow Accepted Business and Legal Standards

- a. Conduct all business operations in a manner that complies with applicable laws and regulations and merits the trust and respect of those whom we serve.
- b. Fairly and accurately represent our services and responsibilities to the public.
- c. Protect confidential information entrusted to D-H from affiliates, vendors, referral sources, contractors, service providers, and others.
- d. Do not disclose or use for your own or other’s personal gain any D-H trade secret, intellectual property, and/or other private or confidential information that you learn through your job duties.

18. Follow Rules Governing Political Activities in the Workplace and Public Representation

- a. Do not use D-H or Dartmouth College titles or affiliations in connection with supporting or opposing candidates on public ballots.
- b. You may use D-H or Dartmouth titles or affiliations in public oral or written presentations for purposes of professional identification, but not to represent the position of D-H unless you have obtained prior express permission to do so.
- c. Do not pursue personal political activities while in the workplace.
- d. Do not use D-H or Dartmouth College letterhead, email, or other resources for personal political activities or for personal commercial purposes.

Ideals

1. Personal Virtues

- a. Strive to cultivate and practice virtues, such as caring, empathy, and compassion.

2. Conscientiousness

- a. Fulfill your professional and work-related responsibilities conscientiously.
- b. Notify the responsible supervisor if something interferes with your ability to perform clinical or support tasks effectively.
- c. Learn from experience and knowledge gained from errors in order to avoid repeating them.
- d. Dedicate yourself to lifelong learning and self-improvement by implementing a personal program of continuing education and continuous professional development and improvement.
- e. Learners should complete all assignments accurately, thoroughly, legibly, and in a timely manner.
- f. Learners should attend scheduled classes, laboratories, seminars, and conferences except for justified absences.

3. Collegiality

- a. Teach others at all levels of education and training.
- b. Be generous with your time to answer questions from learners, patients, and patients' family members.
- c. Be a good D-H citizen by participating in your fair share of the communal work of the organization.
- d. Adopt a spirit of volunteerism and altruism in teaching and patient care tasks and other organization-wide activities.

4. Personal Health

- a. Develop a personal life style of dietary habits, recreation, disease prevention, exercise, and outside interests to optimize physical and emotional health and enhance professional performance.
- b. Encourage patients' responsibility for self-care management.

5. Objectivity

- a. Avoid providing professional care to close colleagues, family members, and

friends, and to persons with whom you have a romantic relationship, outside the context of a professional-treating relationship. *[Clinicians can consult the AMA Code of Medical Ethics Opinion 8.19 for justified exceptions].*

6. Responsibility to Society

- a. Avoid unnecessary patient or societal health care monetary expenditures.
- b. Conserve health care resources by using them efficiently and responsibly.
- c. Seek resources to support improved health outcomes for uninsured and underinsured patients.

Historical Background

The Code of Ethical Conduct was drafted as the Dartmouth-Hitchcock Medical Center Code of Professional Conduct in 1991 by the Hitchcock Clinic, Mary Hitchcock Memorial Hospital (MHMH), and Dartmouth Medical School (DMS), and was endorsed by the Veterans Affairs Medical Center in White River Junction (VAMC). Subsequent revisions of the Code were made and approved by the combined Board of Governors of the Dartmouth-Hitchcock Clinic (D-HC) and MHMH, and were endorsed by DMS and the VAMC. The 2010 revision was made by D-HC and MHMH (now jointly called Dartmouth-Hitchcock, or D-H) and renamed the Code of Ethical Conduct-D-H to be applicable more generally. In 2016, Dartmouth-Hitchcock made additional updates to the Code of Ethical Conduct-D-H.

Approved by the Board of Governors MHMH/D-HC – Lebanon Region, 10/12/06; revised and approved February 25, 2010. Minor revisions recommended by Human Resources and approved by Organizational Ethics Committee, 8/14/2013. Reviewed by Organizational Ethics Committee with no revisions 5/14/2014. Approved by D-H Board of Trustees 6/20/2014. Approved by D-H Board of Trustees 3/17/2017.

* Behaviors that also may violate federal or state laws.

Responsible Owner:	Organizational Ethics	Contact(s): email	Riordan, Brittany
Approved By:	Office of Policy Support - Organizational Policies Only; Organizational Ethics Committee	Version #	5
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Related Polices & Procedures:	Business and Travel Expense Reimbursement Policy Communication After Significant Adverse Event Procedure Compliance Issues Reporting Policy Conflict of Interest Policy (COI) - Personal Gifts including Meals, Travel, and Education Conflict of Interest (COI) in General and Business Affairs Policy Conflict of Interest (COI) Consulting and Vendor Sponsored Activities Policy Disruptive Behavior of Employees Policy Documentation Standards Policy - Nursing Donated Funds Management Policy D-HH False Claims Act Policy Fitness for Duty Policy - Employees, Covered Individuals		

Printed copies are for reference ONLY. Please refer to the electronic copy for the latest version.

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Approval Date: 05/22/2020

	Non-Discrimination and Anti-Harassment Policy Hazardous Chemical Communication Policy Immunization Requirements and Exemption Policy - Employees, Covered Individuals Nepotism and Relationships at Work Policy - Employees, Covered Individuals Personal Protective Equipment and Work Clothing Policy Provider Documentation Policy Reporting a HIPAA Privacy Incident Safety Management Plan Social Media and Web-Based Communication Policy - Employees, Covered Individuals Substance Abuse and Drug-Free Workplace Policy - Employees, Covered Individuals The Dartmouth Health Statement on the Privacy & Confidentiality of Patient Information
Related Job Aids:	How To Report Workplace and Compliance Concerns - Job Aid