

**HUNTINGTON HOSPITAL
ADMINISTRATIVE POLICY & PROCEDURE**

SUBJECT: STANDARDS OF CONDUCT	POLICY NO: 013	Page 1 of 10
AUTHORIZED APPROVAL:	EFFECTIVE DATE: 08/2021	SUPERCEDES/REPLACES: 08/08/2019;10/07/2019

MISSION AND VISION STATEMENTS

Huntington Hospital is a non-profit, community-based medical center.

Mission

Our mission is to provide excellent health care and compassionate service to each person by bringing together outstanding physicians, caring nurses, professional staff and advanced technologies.

Vision

Our vision is to be the leader in creating community well-being through world class care delivered with kindness and dignity.

CORE VALUES

We are here for patients, their families, and the communities we serve. Everything we do is a reflection of our leadership, dedication to excellence, and commitment to providing accessible, compassionate community care

- **RESPECT** We affirm the rights, dignity, individuality and worth of each person we serve, and of each other.
- **EXCELLENCE** We strive for excellence, quality and safety, and we are committed to providing the best care, work environment and service possible.
- **INTEGRITY** We honor the commitments that we make, believe in fairness and honesty, and are guided by our ethics.
- **STEWARDSHIP** We wisely care for the human, physical and financial resources entrusted to us.
- **COLLABORATION** We work closely and productively with each other, with those we care for, and with the community.

COMPLIANCE PROGRAM

Many different laws, regulations and professional standards affect health care. Therefore, our Compliance Program is designed to cover many workplace issues and concerns, such as quality of care, proper treatment of patients and employees, accurate and appropriate billing practices, and the maintenance of a safe workplace.

Support for the Compliance Program

Huntington Hospital has appointed a Compliance Officer to support the provision of health care services with integrity and all activities in a lawful and ethical manner. The Compliance Officer is supported by a Compliance Committee comprised of key management personnel representing multiple disciplines for the overall implementation of the Compliance Program.

Senior Level Accountability

The Compliance Officer reports to the Chief Executive Officer and the Board Audit and Compliance Committee. The Board has ultimate authority for the organization's commitment to compliance.

Commitment of Huntington Hospital

Huntington Hospital maintains a policy of non-retaliation/non-retribution to protect employees who wish to ask questions, express concerns or report problems. It is the organization's responsibility to support these policies.

Responsibility of Employees, Physicians and Volunteers

All employees, physicians and volunteers of Huntington Hospital have the duty to uphold the organization's standards and conduct all activities in a lawful and ethical manner. Individuals who suspect a violation of any law, regulation or standard, must report this to their manager, the Human Resources Department, the Compliance Hotline or Compliance WebLine, or directly to the Compliance Officer.

ASKING QUESTIONS, EXPRESSING CONCERNS AND REPORTING PROBLEMS

Positive relations and morale can best be achieved and maintained in a work environment where ongoing and open communication exists among supervisors and personnel. This includes candid discussions of employee problems and concerns.

- Employees must report potential violation of laws, regulations, ethics, policies or procedures or these Standards of Conduct.
- Initially, employees should contact their own supervisor or a human resources representative to voice their concerns.

- If concerns remain unresolved, employees are expected to raise the issues with individuals at the next supervisory level, up to and including the highest level of management.

COMPLIANCE HOTLINE AND COMPLIANCE WEBLINE

Employees are urged to report concerns to a supervisor or to Human Resources. However, Huntington Hospital recognizes that there will be times when concerns cannot be properly addressed through the normal chain of command. Under such circumstances, personnel are encouraged to report their concerns to the Compliance Officer. Huntington Hospital has initiated a hotline and WebLine service for this purpose. Confidentiality is a key component of the Compliance Hotline and Compliance WebLine. It is managed by an outside service provider. Therefore, callers can have confidence that their voice will not be recognized by an operator at Huntington Hospital, or any of its affiliates. To reach the hotline, employees can call 1-866-311-4231. The Compliance WebLine can be reached at the following web address: www.hhcompliancewebline. The hotline and web line are available twenty-four hours a day, seven days a week.

- All calls to the hotline and web line will be taken seriously.
- Requests for information or action will be handled promptly and professionally.
- All calls and submissions will remain confidential to the extent permitted by law unless the caller and Huntington Hospital agree otherwise.
- Callers may remain anonymous. There are, however, circumstances when Huntington Hospital may not be able to research a situation unless the identity of the caller is known.
- Huntington Hospital will protect the privacy of any individual alleged of wrongdoing when appropriate. As such, Huntington Hospital may not be able to reveal any specific action taken against other individuals.
- Calls to the hotline will not be traced or recorded. The e-mail address of those submitting reports through the Compliance WebLine will not be given to Huntington Hospital if they are submitting an anonymous report.
- Huntington Hospital will not retaliate against any employee who, in good faith, reports a concern to management, Human Resources, the Compliance Officer, the Compliance Hotline or the Compliance WebLine.

QUALITY OF CARE AND SERVICES

We are committed to providing a caring and comfortable environment and each of us makes an integral contribution in creating this environment.

- ◆ We will be responsible for understanding the requirements and needs of our patients and do the very best we can to fulfill those obligations by providing high quality care and services in a responsible, reliable, appropriate and cost-effective manner.
- ◆ We will treat each patient with dignity, respect and courtesy at all times.
- ◆ We will provide only medically necessary services and products to patients which comply with all applicable laws, regulations and professional standards.

- ◆ We will demonstrate sensitivity and responsiveness to our patients by listening attentively and patiently to comments, ideas and concerns.
- ◆ We will employ only individuals with proper experience and expertise in meeting the needs of our patient population.
- ◆ We will report any deficiency or error to a supervisor for resolution.
- ◆ We will ensure that clinical care is delivered by properly licensed and/or credentialed individuals.
- ◆ We will provide treatment to patients of Huntington Hospital in a safe manner, based solely on their clinical needs as prescribed by appropriate medical personnel.
- ◆ We will ensure that our patients are well informed about treatment alternatives and the various risk factors associated with each treatment or no treatment.
- ◆ We will comply with all accrediting agency standards, laws and regulations regarding the evaluation and treatment of patients with emergency medical conditions.
- ◆ We will comply with all laws and regulations regarding patient rights.
- ◆ We will provide treatment and medical services without discrimination based on race, age, religion, national origin, sex, sexual orientation, disability, diagnosis or ability to pay.
- ◆ We will be responsible for maintaining the integrity and quality of our job performance.
- ◆ We will seek to identify areas for improvement in the performance of our authorized duties and take steps to make positive changes. From time to time we may use an employee survey(s) to identify opportunities for improvement.

COMPLIANCE WITH LAWS AND REGULATIONS

We are committed to complying with all laws, regulations, standards and other compliance requirements that apply to the business of Huntington Hospital.

- ◆ We will not intentionally pursue any business opportunity that requires engagement in unethical or illegal activity.
- ◆ We will not solicit or receive, or give or offer to give, anything of value to physicians or others for the referral of patients or services.
- ◆ We will not accept or offer kickbacks, bribes, rebates or flow of any kind of benefits intended to induce referrals.
- ◆ We will maintain all company business data, records and reports completely, accurately and truthfully. All accounting books and records will be maintained according to generally accepted accounting principles and established accounting and internal control policies and procedures.
- ◆ We will ensure all reports or other information required to be provided to any federal, state or local government agency will be filed timely, accurately and in conformance with the applicable laws and regulations governing such report or information. False statements by employees to a government agency will not be tolerated. Deliberate misstatements to government agencies will expose the employee involved to disciplinary action up to and including termination.

- ◆ We will not offer or pay anything of value to anyone, patient or medical provider, in marketing Huntington Hospital.
- ◆ We will ensure that all marketing and advertising representations by Huntington Hospital are truthful, fair, accurate, complete and in compliance with laws and regulations. We will not make any false or misleading statements about Huntington Hospital or its services or another organization or its services.
- ◆ We will ensure that all contracts or agreements are reviewed and approved by appropriate management or legal counsel for compliance with applicable laws, regulations, agreements and Huntington Hospital standards and policies.
- ◆ We will ensure that payments to physicians or others who may refer patients will be proper for the services provided and at contract rates which do not exceed fair market value and not for referrals. Payments will be supported by proper documentation that the contracted services were in fact provided and needed.
- ◆ We will follow state, federal and international laws pertaining to intellectual property, e.g., copyright protection. This includes duplication of print materials, as well as duplication of licensed computer software.
- ◆ We will comply fully with the law and cooperate with any reasonable demand made in a government audit or investigation.
- ◆ We will thoroughly investigate patient or visitor allegations of inappropriate physical contact occurring within or on Huntington Hospital property.

CODING AND BILLING INTEGRITY

We are committed to the proposition that all billings for patient services and other transactions must be properly documented and authorized by management. All records must be accurately and completely supported in the hospital's books and records.

- ◆ We are committed to providing quality care for all those who come to Huntington Hospital regardless of ability to pay or source of payment.
- ◆ We will maintain honest and accurate records of all our activities.
- ◆ We are committed to both accurate billing and submission of claims only for services that are actually rendered and medically necessary.
- ◆ We will not file a claim for services that were not rendered at all or were not rendered as described on the claim form.
- ◆ We will ensure that the diagnoses are properly coded and that they are supported by medical necessity requirements.
- ◆ We will not use diagnostic information provided by a physician from earlier dates of services, unless conforming to approved standing orders.
- ◆ We are committed to ensuring that bills submitted for payment are properly coded, documented and billed in accordance with all applicable laws, regulations, guidelines and policies.
- ◆ We will research all credit balances and refund any money received that is not due to us in a timely manner.
- ◆ We will promote and adhere to the goal of full and accurate compliance with all laws and regulations. We will not submit any claims for payment or reimbursement of any kind that are false, fraudulent, inaccurate, incomplete or fictitious.

- ◆ We will bill for services using only charge codes that accurately describe the services that were provided. If inaccuracies are discovered in bills that have already been sent, we will take immediate steps to alert the payer and correct the bill, including repayment if appropriate.

CONFLICTS OF INTEREST

We have a responsibility to Huntington Hospital, the community, and to our patients. Therefore, we are committed to avoiding any activity, practice or act that conflicts with the interests of, or that could bring into question, Huntington Hospital's integrity.

- ◆ We will avoid situations where we have a personal, professional, or business relationship with the patient.
- ◆ We will conduct ourselves in accordance with high standards of integrity, honesty and fair dealing, to avoid any conflict between personal interests and the interests of Huntington Hospital or its patients.
- ◆ We will avoid engaging in activities, practices or acts which inappropriately conflict with the interests of Huntington Hospital or its patients. Situations that would create, or appear to create, a conflict of loyalty or interest should be avoided unless properly reviewed and approved in advance. Conflicts of interest exist, for example, where an employee's actions or activities, on behalf of Huntington Hospital, involve the obtaining of an improper personal gain or advantage, or an adverse effect upon the interests of Huntington Hospital. Appearances do count when it comes to conflicts of interest, because those on whom our success may depend may judge the conduct of an employee by the appearance of the conduct.
- ◆ We have an affirmative duty to avoid accepting or providing benefits that could be construed as conflicting with Huntington Hospital's legitimate business and our personal interests including, without limitation, payments, fees, services, discounts, valued privileges or other favors where these would, or might appear to, improperly influence performance of duties, all as set forth in approved policies.
- ◆ We will only accept gifts that are provided within the scope of approved policies.
- ◆ We will decline any offers of money from patients, their families, and visitors.
- ◆ We will not provide cash gifts to physicians or other referral sources except as otherwise allowed by law and organizational policy.
- ◆ We will conduct the business of Huntington Hospital to the best of our ability for the benefit and in the best interests of Huntington Hospital.
- ◆ We will not become involved in any manner with competitors, contractors, customers or suppliers of Huntington Hospital, if such involvement would result in improper personal gain or the appearance of improper personal gain.
- ◆ We will not allow employees to have a reporting or business relationship with relatives without disclosing that information and securing written permission from the Human Resources Department and the respective hiring department. Placing business with any firm, in which there is a family relationship, could constitute a conflict of interest.

- ◆ We will not use, for our personal benefit, any information about Huntington Hospital or proprietary or nonpublic information acquired as a result of our relationship with Huntington Hospital, including patient information.
- ◆ We will disclose to our manager the facts of any situation or transaction that will or may give rise to a conflict of interest.

HUMAN RESOURCES

We are committed to attracting, retaining and developing the highest quality and most dedicated work force possible in today's market. The employees of Huntington Hospital are our most valuable asset. We strive to hire and promote people on the basis of their qualifications, performance and abilities, and are determined to provide a work environment free of any form of illegal discrimination or harassment, including sexual harassment. Further, Huntington Hospital is committed to maintaining a workplace where each employee's privacy and personal dignity are respected and protected from offensive or threatening behavior.

- ◆ We will maintain a policy of Equal Employment opportunity for all applicants and employees without regard to race, color, religion, sex, national origin, age, non-disqualifying disability or veteran status, or other protected category except where sex, age or non-disqualifying disability is a bona fide occupational qualification. We will hire on the basis of a prospective employee's education, skills, experience, integrity and the ability to perform the job responsibilities.
- ◆ We will adhere to the Huntington Hospital nondiscrimination policy. No employee will discriminate against a patient, employee or medical staff appointee because of race, color, age, religion, non-disqualifying disability, sex or national origin or other protected category.
- ◆ We will require employees whose position requires national, state or other licensure or registration to be responsible for keeping such licensure or registration current and in effect.
- ◆ We will not tolerate sexual harassment of our employees or others on our property including unwelcome sexual advances and other offensive verbal or physical conduct of any nature.
- ◆ We will welcome employees' questions or concerns. Every manager has a responsibility to create a work environment in which problems and concerns can be raised and openly discussed.
- ◆ We will encourage employees to resolve differences of opinion through informal discussions with their managers. If necessary, employees may also pursue a formal employee appeal or grievance. These procedures are available through department management, the Human Resources Department or the Compliance Officer.
- ◆ We will expect employees to show respect and consideration of one another regardless of position.
- ◆ We will not permit any action of retaliation or reprisal based upon the disclosure by an employee in a reasonable manner that the employee has information or a reasonable belief that the employer, or an employee of the employer, has violated, is

violating or will violate a law, regulation, Huntington Hospital policy or these Standards of Conduct.

SAFEGUARDING PROPERTY, ASSETS AND INFORMATION

We are committed to using our resources wisely and will be accountable to ourselves and to others for their proper use.

- ◆ We will ensure that all patient and provider information, in whatever form it exists, is handled in a manner to protect against improper access or use.
- ◆ We will maintain the privacy and confidentiality of patient-identifiable medical and other information in accordance with all State and Federal Laws.
- ◆ We will refrain from discussing confidential information in public areas (e.g., elevators, hallways, cafeteria, etc.).
- ◆ We will refrain from posting confidential information on the internet or on social media sites such as Facebook or Twitter.
- ◆ We will ensure that confidential information is given to another employee only when it is necessary to do so in the performance of their assigned duties.
- ◆ We will not, at any time during or after our employment, disclose confidential information, or permit any person to examine or make copies of reports or documents that relate to confidential information.
- ◆ We will report all provider, patient and proprietary information accurately.
- ◆ We have the responsibility to reasonably and lawfully protect the individual rights of our patients and employees and others credentialed to practice at Huntington Hospital facilities.
- ◆ We will not use or reveal, outside the context of official duties at Huntington Hospital, any confidential patient or other proprietary information. We will not use patient information directly or indirectly for personal gain or enjoyment or disclose confidential information obtained as an employee of Huntington Hospital.
- ◆ We will not offer to disclose to a prospective new employer, or use during the course of any new employment or private business, proprietary information obtained during the course of employment with Huntington Hospital.
- ◆ We will be personally responsible and accountable for the proper expenditure of Huntington Hospital funds.
- ◆ We will preserve Huntington Hospital assets, property, facilities, equipment and supplies, as well as the property of others.
- ◆ We will ensure that all surplus, obsolete or junked property is disposed of in accordance with applicable policies.
- ◆ We will allow only authorized people to have access to Huntington Hospital's computer systems and software.
- ◆ We will not use Huntington Hospital's computer system and software for unauthorized purposes.

MAINTAINING A SAFE WORK ENVIRONMENT

We are committed to operating in an environment where the health, safety, privacy, and comfort of patients and employees comes first.

- ◆ We will maintain a safe and healthy work environment in accordance with applicable laws and regulations.
- ◆ We will be responsible for eliminating or minimizing, to the extent reasonably feasible, any hazards to the health and safety of employees and patients, in accordance with applicable laws and regulations.
- ◆ We will perform our work in a manner so that no reasonably avoidable harm is caused to patients, other employees or ourselves.
- ◆ We will not unlawfully manufacture, distribute, dispense or possess a controlled substance or drug not medically authorized, alcohol or any other substance that may impair job performance or pose a hazard to the safety and welfare of the employee, patients or any other employee.
- ◆ We will not report for work or perform our work under the influence of alcohol, a controlled substance, illegal drugs or unauthorized use of legal drugs.
- ◆ We will refrain from any threats or acts of violence and immediately report any threats or acts of violence to management and/or security.
- ◆ We will comply with all applicable laws, regulations, policies and procedures in the use of Huntington Hospital buildings, equipment, property and medical products.
- ◆ We will comply with all applicable laws in the discharge and disposal of medical waste or other hazardous materials.
- ◆ We will immediately report to management, upon detection, any existing or potential condition hazardous to human health or the environment or in violation of Huntington Hospital environmental practices.

RESPONSIBLE CONDUCT OF RESEARCH

Huntington Hospital has a responsibility to its patients, staff, and its community to participate in research if the primary goal of that research is to improve the effectiveness of medical diagnosis, treatment, and prevention of disease. Huntington Hospital is committed to participating in research in an environment that complies with established law and ethics that pertain to the health, safety, privacy, rights and welfare of human subjects.

- ◆ We will ensure that all research is conducted by individuals with appropriate credentialing and experience by Huntington Hospital, and who have had training in the responsible conduct of human subjects research.
- ◆ We will ensure that prospective research subjects are informed of research projects in an honest and non-coercive manner that fully and fairly explains the purpose of the proposed research, the procedures to be followed, the foreseeable risks or discomforts involved in the research, any foreseeable benefits from the research, any alternative treatments (and the risks and benefits involved in those alternatives), the available treatment if any complications arise, if any compensation is available,

- that the prospective subject may withdraw from participation in the research at any time without penalties, and allows for the prospective subject to have questions answered before signing any agreement.
- ◆ We will maintain the confidentiality of any information provided to the Hospital by a research subject, prospective research subject, or sponsor in accordance with professional ethics and federal and state laws and will use or disclose any individual's protected health information only as permitted or required by law.
 - ◆ We will conduct all research in accordance with applicable federal and state laws governing human subject protections, informed consent, fraud and abuse, and conflicts of interest. No illegal or unethical action by any person will be tolerated regardless of intent to benefit a subject, researcher or Huntington Hospital.
 - ◆ We will bill/charge either a clinical trial sponsor or the subject's health care benefit plan (if applicable) for clinical research items and services provided by Huntington Hospital, but will not submit duplicate claims for the same item or service, or submit multiple claims for the same item or service to different payors. If a research subject has coverage under a health care benefit plan, claims may be submitted only in accordance with the terms and conditions of that plan. We will ensure that billing/charges for research related items, treatment or procedures are not billed to the patient unless the patient has been given adequate notice.
 - ◆ We will ensure that any compensation to the hospital for research activities conducted by or on behalf of Huntington Hospital reflects the fair market value of the services actually performed. Research agreements with sponsors will not include any gifts, favors, or other improper inducements that may influence an individual's decision-making.
 - ◆ We will ensure that any funds, equipment, or supplies provided by either government agencies or private sponsors will be used exclusively for their intended purpose, and that we will appropriately account for the use of such funds, equipment, or supplies in accordance with the terms of any research agreement, grant or award.
 - ◆ We will take reasonable measures to preserve the scientific integrity of the research conducted by or on behalf of Huntington Hospital and take measures to identify and/or prevent scientific misconduct.

REFERENCES OIG Compliance Program Guidance for Hospitals
 Huntington Hospital Compliance Program Manual

SOURCE

Compliance & Internal Audit Services
Compliance Committee