

SVHC

100 HOSPITAL DRIVE, BENNINGTON VT 05201



POLICY • PROCEDURES • GUIDELINES

Code of
Ethical
Conduct

Pertains to: Corporate Compliance & Legal Services

Effective Date: 10/22/98

Revised Date: 7/2011, 10/2012, 7/29/13, 8/28/13, 6/8/2015, 5/03/2016

Review Date: 1/04, 1/05, 10/10

I. PURPOSE:

Southwestern Vermont Health Care (SVHC) is committed to improving the quality of patient care, and recognizes that an effective compliance and ethics program promotes that goal. Therefore, SVHC's Board of Trustees has adopted this Code of Ethical Conduct to provide standards for employees that promote integrity, protect the health system, and enhance SVHC's ability to achieve its mission.

II. SCOPE:

The code of Ethical Conduct applies to **all members of the SVHC community** including:

- A. Members of the Board of Trustees and Boards of Directors of subsidiary corporations
- B. President and CEO and all members of Executive Management
- C. All physicians and other medical professionals credentialed by SVHC
- D. All employees, including contracted and per diem employees
- E. All volunteers, students and teachers while speaking or acting on behalf of SVHC or subsidiary corporations.

III. POLICY:

As endorsed by the SVHC Board of Trustees, all members of the SVHC community are committed to constantly improving the quality of care to SVHC and share the following Guiding Principles:

- A. **Act Ethically and with Integrity:** All members of the SVHC community shall act ethically and promote a culture of ethics and compliance with the law. SVHC community members shall:
 1. Act according to the highest ethical and professional standards of conduct.
 2. Lead others to ethical standards through example, instruction, and personal accountability.

See also: [SVHC Employee Handbook](#)

- B. **Follow all Laws and Regulations:** All members of the SVHC community, individually and as managers, shall ensure that legal requirements are met as they perform their work function. SVHC community members shall:
 1. Learn and follow all laws, regulations, and policies related to their activities.
 2. Ensure that the work of everyone they manage or supervise also follows all laws, regulations and policies.
 3. Ensure that all such employees receive the appropriate education and training on applicable laws, regulations, and policies.
 4. Promote the prevention of fraud and abuse by strictly upholding all state and federal laws and regulations related to billing and coding, relationships with medical providers, avoiding kickbacks or other improper payments, and protecting the non-profit status of SVHC.

See also: [Law and Regulation Education and Compliance policy](#)
[False Claim Act Notification](#)

- C. **Promote a Culture of Compliance:** All members of the SVHC community shall actively promote legal compliance within the SVHC community by:
 1. Working to identify, prevent and detect all compliance violations.
 2. Reporting suspected violations to the appropriate SVHC official.
 3. Properly disclosing and resolving reports of violations in their area of responsibility.

4. Treating all reporters of suspected violations with respect and at no time engaging in any act of retaliation.
See also: [Non-Retaliation](#)
- D. **Avoid Conflicts of Interest:** All members of the SVHC community must behave in an impartial manner and with loyalty to SVHC. SVHC community members shall:
1. Avoid actual or perceived conflicts of interest in their outside activities.
 2. Disclose to their supervisor all activities that may present or appear to present a conflict of interest.
 3. Ensure that personal relationships do not interfere with the impartial performance of job duties.
 4. Decline to provide services or endorsements for a competitor of SVHC or any similar type organization without the express approval of their supervisor (for staff, from their manager; for employed credentialed medical staff, see CMO; for EMT, see CEO).
 5. Decline all gifts and gratuities *except* in accordance with the current *Gifts, Gratuities, Prizes and Honoraria Policy*.
- See also:* [Conflicts of Interest policy](#)
[Gifts, Gratuities, Prizes and Honoraria Policy](#)
[Gifts and Gratuities FAQs](#)
[Moonlighting](#)
- E. **Be Financially Responsible:** At all times, members of the SVHC community shall behave in a financially prudent and honest manner by:
1. Communicating honestly and candidly with internal staff and external auditors regarding all SVHC financial matters.
 2. Prudently using SVHC's assets and funds.
 3. Submitting all time cards and financial records in an accurate and timely manner (for example, budget requests, expense reports, and other financial records).
- See also:* [Travel Reimbursement](#)
[Time and Attendance policy](#)
- F. **Protect Confidential Information:** All members of the SVHC community are responsible for maintaining the confidentiality of sensitive information of many types. SVHC community members are expected to:
1. Hold all patient protected health information in the highest regard, keeping it confidential at all times, and only access patient information required for the performance of your duties to SVHC.
 2. Protect the confidentiality of all SVHC proprietary business information including business records, plans, trademarks, symbols and personnel information.
 3. Maintain data security and privacy of all electronic information.
 4. Learn and follow all laws, regulations, and policies regarding the use, access to, retention, and destruction of confidential information.
 5. Protect the confidential or proprietary information of any business associate of SVHC by not using such information to give SVHC an unfair competitive advantage.
- See also:* [HIPAA Confidentiality of Information](#)
- G. **Promote a Safe and Healthy Workplace:** SVHC community members share the responsibility for creating a healthy and secure workplace, and shall:
1. Learn and follow all laws, regulations, and policies relating to environmental and workplace safety.
 2. Actively promote a safe and healthy workplace by
 - a. notifying the appropriate SVHC official of any workplace accidents, injuries and unsafe conditions.
 - b. Using all appropriate personal safety equipment.
 - c. maintaining the security of SVHC's physical plant and assets.
 - d. protecting the environment through the careful handling of potentially harmful materials.
 - e. using resources wisely through reuse and recycling of materials.
- See also:* [Safety Management Plan](#)
- H. **Nondiscrimination:** All members of the SVHC community are committed to the fair and equitable treatment of all individuals and shall make all decisions without regard to personal classifications or characteristics. SVHC community members shall:
1. Follow all laws, regulations, and policies regarding fair labor practices.
 2. treat all individuals without regard to race, color, religion, national origin, gender, ancestry, age, disability, service in the armed forces, sexual orientation or gender identity, or other classification

prohibited by state or federal law.

See also: [Equal Employment Opportunity EEO](#)

I. Delegation of Authority:

The SVHC Board of Trustees endorses this code and delegates the enforcement and support for this code to the CEO and administrative staff for the promulgation and periodic review of the appropriate policies, procedures, review, and education. The SVHC Board of Trustees shall review and approve all changes to this code.

Author: Susan Purcell Montiel, Administrative Director, Corporate Compliance & Legal Services

Approved: Audit and Compliance Committee, March 4, 2011

Approved: Executive Compliance Committee, March 14, 2011

Approved: Governance Committee, July 18, 2011

Approved: Board of Trustees, July 28, 2011, September 25, 2015

Computer Operator: Patti Bradley