



East Adams Rural
Healthcare

Code of Conduct

July 9, 2019

East Adams Rural Healthcare

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OUR MISSION

Achieving excellence through exceptional quality to serve the health care needs of the District residents and travelers.

EARH and its District Clinics are a regional hub for health care in Eastern Adams County that is well-integrated with a network of health care partners to offer exceptional care.

OUR VISION

To provide the best possible healthcare to each individual in our community.

Message from the CEO

The Code of Conduct (COC) is a vital part of achieving our mission and vision providing guidance to ensure that our work is performed in an ethical and legal manner. East Adams Rural Healthcare has worked together as a healthcare team to create the core values we believe are the heart of our existence is in providing exceptional healthcare to our community and surrounding area.

The COC is the cornerstone of our Compliance Program based on appropriate ethical and legal standards that will be updated periodically to reflect changes in law. Our Compliance Program outlines what we do as an organization to comply with legal and ethical requirements as follows:

- Establishes standards with written policies, procedures and the COC
- Educates and trains the workforce, volunteers and providers on compliance matters
- Provides a process for reporting potential violations of laws, policies or COC
- Conducts auditing and monitoring to prevent and identify potential improprieties
- Conducts investigations and responds to reported compliance issues
- Performs routine exclusion verifications to ensure we are not conducting business with ineligible parties that cannot participate in federal or state healthcare programs
- Maintains an effective Compliance Committee and organizational structure
- Appoints a Chief Compliance Officer with an independent reporting relationship to the Board of Directors

_____ (CEO Signature)

INTEGRITY WITH PATIENT CARE

COMPASSION

We have the gift to recognize and empathize with each individual's needs and go the extra mile to meet those needs. We will provide support and encouragement in addressing each individual's needs, be considerate and understanding to promote a nurturing and healing environment. Our empathy will be demonstrated through kind thoughts, words and actions.

PATIENT RIGHTS

Patients and families are given a statement of patient rights and responsibilities upon admission, including information about the right to make decisions regarding medical care. We involve patients and families in decisions regarding care to the extent that this is practical and possible. We inform patients about therapeutic alternatives and the risks associated with the care they are seeking.

We provide coordinated discharge planning to all patients as an integral part of the treatment plan in order to support the level of medical, psychological, occupational, rehabilitative and social services needed post-discharge. Patients, families and caregivers are participants in the care and discharge processes and their preferences and choices are given priority whenever possible. We address the wishes of patients related to advance directives and end of life decisions.

PATIENT PRIVACY

Patients and their families trust us with highly personal and sensitive information regarding their medical conditions. We collect information about a patient's medical condition, history, medication and family illnesses in order to provide quality care. We are committed to complying with state and federal privacy laws, and to assisting patients with exercising their patient privacy rights.

Federal and state laws govern the privacy of our patients and their health information in verbal, written and electronic form. The laws apply to the organization, as well as to you as an individual, even after you are no longer working here. Patient privacy laws include serious consequences for failing to protect patient privacy, including potential fines, imprisonment, loss of your professional license and patients' right to sue both the organization and you personally. Additionally, violating our privacy policies can lead to disciplinary actions, up to and including termination. Our Compliance Department monitors electronic patient records to determine who is accessing the record and whether the access is consistent with job functions.

RESPECT

We believe in treating others with kindness, dignity and courtesy regardless of age, race, gender, respecting cultural and religious personal differences. We will speak clearly concisely to our customers, avoiding the use of complex medical or clinical terminology when possible.

QUALITY OF CARE

We believe in providing healthcare services that exceed the expectation and changing needs of our community. We are committed to putting our customers first, to avoid injuries and provide clinical services based on scientific knowledge, best practice and cost-effectiveness. We provide care that does not vary in quality due to gender, ethnicity, geographic location, socio-economic status, sexual orientation or perceived disability. We treat all patients with dignity, respect and courtesy.

BILLING AND FINANCE

CHARITY CARE

Financial assistance is available to patients in the form of charity care based on the patient's individual financial situation and supports the hospitals not-for-profit mission. Eligibility criteria may be found in the Financial Assistance and Charity Care Policy.

DOCUMENTATION, CODING AND BILLING

East Adams Rural Healthcare will provide medically necessary services that are documented, coded and billed accurately based on current payer and/or government standards, within the scope of applicable federal, state, and professional guidelines and applicable staff by-laws.

GROWTH/FISCAL RESPONSIBILITY

We believe in advancing and extending the services we provide by responsibly using our assets to protect the future of East Adams Rural Healthcare. We maintain a high standard of accuracy and completeness in the documentation and reporting of all financial records. Our financial information conforms to generally accepted accounting principles or other applicable rules and regulations.

State and federal laws require us to submit reports of our operating costs and statistics, known as cost reports. These laws define what costs are allowable and outline the appropriate methodologies to claim reimbursement for the cost of services provided to government program beneficiaries. We are committed to the preparation, submission and settlement of accurate, timely and complete cost reports.

OVERPAYMENTS

Any funds identified and reconciled that the facility has received and retained in excess of the amount due or payable will be promptly refunded to the appropriate federal health care program and/or in accordance with commercial payor's policies. A credit balance may exist in a patient account after payment by both the patient and a federal or state healthcare program. We endeavor to accurately track, report and refund credit balances.

RESOURCES

East Adams Rural Healthcare is dedicated to responsible stewardship and resources must be used for business purposes and not for personal gain. All accounts, financial reports, tax returns, expense reimbursements, time sheets, and other documents including those submitted to government agencies must be accurate, clear and complete.

Business Conduct

ACCURACY OF RECORDS/DOCUMENT RETENTION AND DESTRUCTION

It is our duty to create and maintain accurate and complete records, as well as only destroy organizational records, in compliance with federal and state laws and applicable policies. East Adams Rural Healthcare policies provide guidance on the proper creation, amendment, maintenance, retention and destruction of organizational records and documents. Contact the Compliance Officer for additional guidance.

ANTI-KICKBACK LAWS

The federal Anti-Kickback Law prohibits individuals and organizations from knowingly or willfully offering or paying, directly or indirectly, any form of remuneration in return for, or to induce, the referral of any patient or business that is covered by Medicare, Medicaid or any other federal or state health care financing program. Remuneration includes kickbacks, bribes or rebates.

If one purpose or reason for a financial transaction or arrangement with an individual or organization is to induce that individual or organization to refer patients or business to East Adams Rural Healthcare or to recommend the services of either organization, then such transaction or arrangement constitutes a violation of the anti-kickback laws.

All agreements involving patient referral sources, including physicians, hospitals, ambulance services, managed care organizations and other health care organizations and service providers, must be reviewed and approved by the legal counsel prior to execution. The *Contracts Administration Policy* provides additional guidance.

ANTI-TRUST LAWS

We do not engage in activities or negotiate agreements that restrain or obstruct

competition or illegally share proprietary information with competitors. The illegal obtainment or use of proprietary information from competitors is strictly prohibited. Anti-trust violations may subject our organization to severe civil and criminal monetary fines, civil liability for treble damages, and injunctions that could impair our ability to compete effectively. Anti-Trust violations may also subject us individually to imprisonment, personal liability, and substantial monetary fines.

We are required not only to comply with the law but also to avoid activities which, though not illegal, may pose unnecessary risks of litigation, government investigation, or injury to our reputation. The limitations on information exchanges with competitors are designed to aid compliance with Anti-Trust laws and protect our competitive, financial, ethical and reputational interests. Except with legal advice, we do not communicate with a competitor, either directly or indirectly, about the cost of goods, supplies, equipment, salaries, wages, employment contracts, severance agreements, and other proprietary information.

CONFIDENTIAL INFORMATION

We are creators and custodians of various types of confidential, proprietary and private information. East Adams Rural Healthcare workforce and third parties will follow policies regarding access, use protection, disclosure, retention, and disposal of public, private and confidential information.

CONFLICTS OF INTEREST

East Adams Rural Healthcare workforce have an obligation to be objective and impartial making decisions on behalf of East Adams Rural Healthcare. External professional activities, private financial interests, or the receipt of a benefit from third parties can cause an actual or perceived conflict between East Adams Rural Healthcare interests and individual's private interest. East Adams Rural Healthcare workforce will accept benefits, awards, and prizes from external entities only in accordance with established East Adams Rural Healthcare policies and standards. Relationships with third parties, such as consulting, board membership, professional services with a potential or actual conflict of interest will be disclosed to East Adams Rural Healthcare.

EXCLUDED PARTIES

East Adams Rural Healthcare does not hire employees, accept volunteers, contract with or bill for services render by individuals or organizations excluded from participating in federal or state healthcare programs. This includes exclusion from those programs administered by the DHHS Office of Inspector General List of Excluded Individuals Entities (LEIE), the Systems Aware Management (SAM) and the State Medicaid exclusion list. We conduct initial excluded parties checks on potential employees, medical staff, vendors and volunteers, as well as periodic excluded parties checks after the commencement of the

relationship to ensure continued eligibility to participate in federal and state healthcare programs. You have a duty to immediately report any change in your eligibility status to the Compliance Officer.

FALSE CLAIMS ACT AND DEFICIT REDUCTION ACT

The state and federal False Claims Acts (FCA) and the federal Deficit Reduction Act (DRA) protect government programs such as Medicare, Medicaid and Tricare from fraud and abuse. It is illegal to submit claims for payment to government programs that we know, or should know, are false or fraudulent. No specific intent to defraud the government is required for a claim to qualify as a false claim. The FCA defines "knowing" to include not only actual knowledge, but also instances of deliberate ignorance or reckless disregard of the truth or falsity of a claim. Filing false claims may result in damages of up to three times the amount of the government program's loss, fines, imprisonment, entering into a Corporate Integrity Agreement and exclusion from participation in federal and state health care programs. If you know of a potential false claim, contact our Compliance Department immediately, or call the Compliance Hotline to notify the Compliance Officer.

GIFTS

We maintain high ethical standards regarding the offering and acceptance of gifts. Offering or accepting personal gifts may influence our decisions or the decisions of others and may constitute a conflict-of-interest. The appropriateness of offering or accepting gifts depends on the specific circumstances of the gift and who is offering and receiving it. For any questions refer to the policy on Non-monetary compensation for Physicians and to the Gifts policy applicable to employees.

MEDIA

We must contact the CEO before responding to any media inquiries or initiating contact with the media. Additionally, communications with media involving patient information must comply with federal and state privacy laws in order to fulfill our legal and ethical duty to protect patient privacy.

NOT-FOR-PROFIT TAX-EXEMPT ORGANIZATION

We are not-for-profit tax-exempt organizations under the Internal Revenue Code. Therefore, we are not organized or operated for the benefit of private interests. No organizational earnings may financially benefit any private individual.

POLICIES, LAWS, AND REGULATIONS

East Adams Rural Healthcare is committed to sustaining a culture of trust, ethics, and compliance. We want individuals to be comfortable raising concerns when there is a good faith belief that actions of individuals and/or the organization are not consistent with laws, regulations policies or standards. East Adams Rural Healthcare leadership is committed

to maintaining the community trust by ensuring appropriate actions to resolve non-compliance. Employees, providers, students, vendors and volunteers will report suspected compliance violations through standard management channels beginning with one's immediate supervisor, management, the compliance hotline or the Compliance Officer.

POLITICAL CONTRIBUTIONS AND ACTIVITIES

As a not-for-profit entity, East Adams Rural Healthcare is restricted in the amount of political lobbying activities that they may conduct. We are not permitted to influence legislation that is not directly related to our mission. In addition, we may not endorse or intervene on behalf of any candidate for public office, and they may not solicit funds or endorsements in support of political issues or causes.

As individuals, we may exercise our civil liberties by participating, advocating or supporting the political candidates and causes of our choice outside of the workplace. We never engage in or promote the following activities while at East Adams Rural Healthcare or while representing either organization at off-site events and activities, unless those activities are directly related to our mission. Company assets, name and logo may not be used on any written political material. Political campaign clothing, buttons or symbols representing a political candidate or cause, excluding health initiatives or those defined as "protected activities" by the National Labor Relations Board are prohibited.

REPORTING

It is an expectation of the workforce that perceived violations of compliance law, policy or our *Code of Conduct* be reported to the Compliance Department. Failure to report to the Compliance Department may result in disciplinary action, up to and including termination. All reports will be evaluated promptly, completely and fairly. You can report compliance concerns in the following way:

- Calling (509)659-1200 and requesting to speak to the compliance or privacy officer

Reporting a compliance concern in good faith will not jeopardize one's employment. Retaliation against any individual for reporting a compliance concern in good faith is not tolerated. Confirmed violations of this CQC will result in appropriate consequences for the Violators, up to and including termination of employment or other relationships with East Adams Rural Healthcare.

STARK LAW

We conduct all our business practices with physicians in conformity with the federal Physician Self-Referral or "Stark" Law. The Stark Law prohibits referrals for certain Medicare items and services furnished by an organization with which the referring physician, or his or her immediate family member, has a financial relationship, unless a

specific legal exception applies. We are required to immediately report all known or suspected violations of any of these policies to the Compliance Officer.

East Adams Rural Healthcare may directly engage physicians and community providers to provide certain services, such as on-call coverage, moonlighting, training, consulting or administrative services, and pay these physicians directly for such services. In such arrangements, there is a direct compensation relationship between the hospital and the physician and we must consult with the legal counsel to execute a personal services agreement (PSA) with the physician.

We must also strictly follow our organizations' *Non-monetary Physician Compensation Policy* when offering non-monetary compensation or incidental benefits to physicians or their immediate family members.

WORKPLACE ENVIRONMENT

PROFESSIONALISM

We believe in performing our jobs to the highest standards, always demonstrating exceptional character and follow the Code of Conduct. We will demonstrate an ethical work environment by being accountable, responsible and dependable completing jobs assigned and being flexible with change. We will wear our name badges visibly, greet customers with an uplifting spirit and be attentive to our customer's need. We will listen, acknowledge, and respond respectfully to customers concerns, verify understanding by asking questions and encouraging customer feedback.

TEAMWORK

East Adams Rural Healthcare employees are a network of skilled individuals working together to achieve the common goal of providing exceptional healthcare that benefits the people we serve and our organization. We will offer a safe positive, and family orientated environment by executing our core values. We will continue to update our skills, education and training while responsibly managing the assets of East Adams Rural Healthcare.

WORKPLACE HARRASSMENT

As an organization, we are committed to maintaining an environment that is free of unlawful harassment and intimidation. Harassment includes any behavior or conduct that is based on a protected characteristic and that unreasonably interferes with an individual's work performance or creates an intimidating, hostile or offensive work environment. Some examples of harassment are: disparaging or abusive words or phrases; persisting in the use of any name or term which you know may be offensive to that individual; or sabotaging someone's work.

Harassment also includes sexual harassment. The determination of what constitutes sexual harassment may vary with the particular circumstances. In general, unwelcome sexual advances, requests for sexual favors, and other verbal, visual or physical conduct of a sexual nature may constitute sexual harassment when: submission to such behavior is made a term or condition of employment; submission to or rejection of such behavior is used as a basis for making employment decisions; or such conduct unreasonably interferes with someone's work performance or creates an intimidating, hostile, or offensive work environment.

WORKPLACE HEALTH AND SAFETY

In our continuing commitment to an environment of healing and good health, smoking is not permitted anywhere inside the hospital buildings or outside on campus. The use of illegal drugs and abuse of controlled substances in the workplace is prohibited. As a condition of employment, any involvement in the unlawful use, sale, manufacture, distribution or possession of controlled substances, and/or unauthorized use of alcohol in the workplace or working under the influence of such substances is prohibited. Please contact your supervisor or Human Resources if you seek treatment and/or rehabilitation.

We promote personal safety and follow safe workplace practices, including participating in applicable education sessions, using appropriate personal safety equipment, and reporting incidents, injuries, and unsafe situations. We will protect the environment, including carefully handling hazardous waste, harmful agents, materials or conditions and recycle material whenever possible.