

DILEY RIDGE MEDICAL CENTER

SUBJECT: INTEGRITY AND COMPLIANCE: INTEGRITY AND COMPLIANCE PROGRAM & STANDARDS OF CONDUCT

RESPONSIBLE Center Management, Integrity and Compliance Officer, Medical Staff, Board members,

PERSONS: Associates, Contracted Services

POLICY:

1. Diley Ridge Medical Center's Integrity and Compliance Program and Standards of Conduct are a statement of its commitment to achieving full compliance with legal, professional and ethical obligations.
2. The specific form of the Diley Ridge Medical Center Integrity and Compliance Program will change from time to time as new challenges arise and new methods of encouraging integrity become available. However, the Integrity and Compliance Program will include at all times the following essential elements:
 - a. Operation of the program under the guidance of the Integrity and Compliance Officer I;
 - b. The publication and annual reconsideration of Standards of Conduct that outlines principles to be used by all associates and collaborators of Diley Ridge Medical Center in carrying out the affairs of the Center, development of policies and performance of daily work;
 - c. Mechanisms that encourage reporting violations of the Standards of Conduct or Integrity Policies, to investigate such violations and to recommend appropriate sanctions against violators;
 - d. Processes to disseminate information and education to all associates, medical staff, contracted workers, and board members about their legal, professional and ethical obligations while associated with Diley Ridge Medical Center;
 - e. Procedures to monitor and audit compliance to the Integrity Program
 - f. Employment policies to ensure that compliance with those legal, professional and ethical standards is considered an essential element of all employment conditions within Diley Ridge Medical Center, including as an element of the performance appraisal of management level personnel;
 - g. Systems to correct as quickly as possible any deviation from those legal, professional and ethical standards by the use of effective enforcement tools.
 - h. Quarterly reports by the Center Administrator to the Diley Ridge Medical Center Board of Trustees.
3. The Integrity and Compliance Program applies to all individuals providing services on behalf of Diley Ridge Medical Center, including but not limited to: managers, associates, physicians, volunteers, contract labor, consultants, and board members. It is expected that all involved with Diley Ridge Medical Center will comply with the Integrity Program and Standards of Conduct. Failure to comply with the Integrity Program and Standards of Conduct will subject the non-complying individual to sanctions, up to and including immediate dismissal.
4. The Standards of Conduct will apply not to just governmental programs, such as Medicare and Medicaid, but also to all other payors with which the Center does business.

STANDARDS OF CONDUCT

1. **All associates, physicians, board members, and contracted workers shall comply with all federal, state, and local laws applicable to Diley Ridge Medical Center.**

Diley Ridge Medical Center will provide training, education, and on-going notification of changes in laws or policies to hospital associates, physicians and board members.

Vendors and contractors who are not part of the hospital's day to day staff are responsible for their own training and education as to the laws applicable to their services. Upon request, the vendor/contractor must certify to the hospital that he/she/it is in compliance with these requirements.

In the event that an individual does not understand or is unsure of the proper application of the law or policy, it is the obligation of the individual to contact his/her immediate supervisor. The Integrity and Compliance Officer may also be consulted.

If an individual believes that a violation of any applicable regulation has occurred, it is the obligation of that individual to promptly communicate this knowledge as outlined in OIP Policy: Communication and Reporting of Concerns.

2. **In furtherance of Diley Ridge Medical Center's commitment to the highest standards of business ethics and integrity, Diley Ridge Medical Center associates, board members, physicians and contracted workers shall accurately and honestly represent the hospital and shall not engage in any activity that is intended to defraud any person or entity of money, property, or honest services.**

Associates, board members, physicians, and contract workers shall not misappropriate any confidential or proprietary information that belongs to another person or entity, including Diley Ridge Medical Center and shall not utilize or disclose such information or any publication, document, computer program, information, or product in violation of a third party's rights or interest in that item.

Confidential and proprietary information shall be utilized only as may be necessary for performance of job duties. Individuals are responsible for ensuring that they do not improperly copy for their own use documents or computer programs in violation of applicable copyright laws or licensing agreements.

The hospital expects that all individuals refrain from conduct which may violate fraud and abuse laws. These laws prohibit: (a) direct, indirect or disguised payments or benefits in exchange for the referral of patients; (b) the submission of false claims to any payor, and (c) making false representation to any person or entity in order to gain or retain participation in a program or plan, or to obtain payment for any service.

3. **All associates, physicians, board members and contracted workers shall strive to maintain the confidentiality of Diley Ridge Medical Center in accordance with applicable legal and ethical standards.**

All individuals have an obligation to conduct themselves in such a way as to maintain the confidentiality of patient information, including patient records, test results, and personal information.

Information shall only be disclosed and utilized within the hospital by those individuals with a need to know such information in their performance of their duties and responsibilities and outside of the hospital in accordance with applicable law.

In the event a request for release of patient information is made, and the individual receiving the request is unsure of the propriety of the release of information, the individual should not release the information until request is discussed with his/her immediate supervisor.

Information and intellectual property assets of the hospital are important to its success. Information pertaining to the hospital's competitive position, business strategies, reimbursement and financial information, and information relating to negotiations with employees or third parties should be protected and shared only with those who have a need to know that information for the performance of their duties for Diley Ridge Medical Center.

Salary, benefit, or other personnel file information related to associates should be treated as confidential. Vendor contract provisions and similar information should be maintained in a manner designed to ensure confidentiality.

- 4. Managers, board members, physicians, and key individuals involved in decision making on behalf of Diley Ridge Medical Center owe a duty of undivided and unqualified loyalty to the organization. Persons holding such positions may not use their positions to profit personally or to assist others in profiting in any way at the expense of the hospital.**

While not all inclusive the following is a guide in the types of activities by a Diley Ridge Medical Center associate, physician or board member (or a family member of such person) that might cause a conflict of interest: (1) Ownership in or employment by any outside concern which does business with the hospital; this does not apply to stock or other investments in publically held corporation; (2) Conduct of any business not on behalf of the hospital with any vendor, supplier, contractor, or agency, or any of their officers or employees, (3) Representation of the hospital by a member of the hospital in any transaction in which he/she or a family member has a personal interest. (4)Disclosure or use of confidential information for personal profit or advantage of family member; (5) Competition with the hospital by a member of the hospital's staff, directly or indirectly in the purchase, sale, or ownership of property, or property rights or interests, or business investment opportunities.

In the event any member of the hospital becomes aware of an actual or potential conflict of interest, such individual should immediately notify Diley Ridge Medical Center Administrator.

No member of the hospital staff shall perform work or render services for any competitor or for any organization with which the hospital does business or which seeks to do business with the hospital outside of the normal course of his/her employment by Diley Ridge Medical Center without the knowledge and approval of the Administrator. Such an individual shall not be a director, officer, or consultant of such an organization, or permit his/her name to be used such that to indicate a business connection. (Excludes Mount Carmel and Fairfield Medical Center).

A member of Diley Ridge Medical Center's staff must obtain approval from the Administrator prior to serving as member of the Board of Directors/Trustees of any organization whose interests may conflict with those of the hospital. If the interest of the organization will not impact the hospital, i.e. civic, charitable, fraternal, etc., approval is not required. However, individual must disclose in writing all board membership.

Compensation (other than reimbursement for expenses arising from Board participation) that are received by the individual for board services provided during work time in which the applicable individual is being compensated by the hospital shall be paid directly by Diley Ridge Medical Center.

Any questions regarding whether or not board participation might present conflict of interest should be discussed with Diley Ridge Medical Center Administrator.

5. **Business transactions with vendors, contractors, and other third parties shall be transacted free from offers or solicitation of gifts and favors or other improper inducements in exchange for influence or assistance in a transaction.**

It is the intent of this Standard to be construed broadly to avoid even the appearance of improper activity. If there is any doubt or concern whether the specific conduct or activity is appropriate, the individual should contact his/her immediate supervisor or the Administrator.

Hospital associates, physicians, and board members are prohibited from soliciting tips, gratuities or gifts from patients. Gifts of nominal value (\$100 or less, non-cash, and sharable with other staff members) may be accepted.

Hospital associates, physicians, and board members shall not accept gifts, favors, services, entertainment or other things of value to the extent that decision making or actions affecting the hospital may be influenced.

Similarly, the offer or giving of money, services or other things of value with the expectation of influencing the judgment or decision making process of any purchaser, supplier, regulatory official, etc. is prohibited. Entertainment and meals of nominal value may be provided to the hospital's current and prospective business partners and other persons, when such activities have a legitimate business purpose, are reasonable, and are consistent with all applicable laws.

Hospital associates, physicians, and board members may NOT retain gifts from existing vendors which have a nominal value.

Attendance at local, vendor-sponsored workshops, seminars and training is permitted. Attendance, at vendor expense, is permitted only with the prior approval of the Administrator and only if the training will be of benefit to the services and care provided by Diley Ridge Medical Center; the objectives of the training and curriculum must be on file at Diley Ridge Medical Center.

Hospital associates, physicians, and board members may not utilize "insider" information for any business transactions conducted on behalf of the hospital. Personal relationships and business activities with contractor personnel which may be construed by an impartial observer as influencing decision making must be disclosed.

6. **Associates, physicians, board members, and contracted workers shall strive to preserve and protect the hospital's assets by making prudent and effective use of the hospital's resources and properly and accurately reporting its financial condition.**

The unauthorized use or taking of hospital equipment, computers, supplies, materials, services or facilities is prohibited.

All individuals are to refrain from converting assets of the hospital to personal use.

Travel and expenses should be consistent with the job responsibility of the individual and the hospital's needs and resources. A staff member is to have neither a financial loss or gain as a result of business associated travel and expenses.

All financial reports, accounting records, expense accounts, time sheets, payroll, and other documents must accurately and clearly represent the relevant facts or the true nature of a transaction.

7. **Diley Ridge Medical Center expects each person to whom the Standards of Conduct applies to abide by its Standards and to conduct the business and affairs of the hospital in a manner consistent with the general statement of principles set forth in the Standards.**

SPECIAL COMMENTS:

Contracted Integrity and Compliance Officer will assist Diley Ridge Medical Center in fulfilling the above policy requirements.

DEVELOPED BY: Diley Ridge Medical Center Steering Committee ORIGINAL DATE: 9/09

REVIEWED BY: Diley Ridge Medical Center Steering Committee

APPROVAL FOR IMPLEMENTATION BY: Diley Ridge Medical Center Board of Directors

DATE: 10/09

REVIEWED BY: President and COO; Organizational Integrity Officer

REVIEW DATE: 10/11; 7/12; 7/14

REVISION DATE: 10/11

REPLACES: