



Code of Conduct

Message from our President

At Bassett Medical Center you are part of an organization with a proud history of caring for people throughout Central New York. For more than 75 years, generations of dedicated employees have worked at Bassett, carrying forth our organization’s founding mission of patient care, education, and research. Throughout our history, we have served our patients and our community and, in the process, earned a reputation for honor and integrity. Our success is apparent in the unsolicited praise we receive from patients and their families, as well as in objective surveys that confirm our leadership in quality and patient satisfaction.

Every person at Bassett plays a role, directly or indirectly, in the patient experience and, thus, our reputation is based on how we conduct ourselves on a daily basis. Our reputation brings hope to patients who trust us to deliver the most advanced care and attracts people with the highest integrity to seek employment or an affiliation with us.

To help you with the legal and ethical questions you may encounter in your daily work, we have prepared the Bassett Medical Center Code of Conduct (Code). This Code is the cornerstone of the Bassett Compliance Program. The Code is intended to support you by providing a framework for making the right decisions and taking appropriate action in your daily work.

If you have questions regarding this Code or encounter any situation that you believe violates this Code, you should immediately consult your supervisor, another member of management, or the Corporate Compliance Officer. You also have the option to report compliance concerns anonymously to the compliance hotline (607- 547-3017). Each of us has the responsibility to report any concerns we may have, and you can rest assured that there will be no retaliation or retribution for asking questions or raising concerns in good faith about potential improper conduct.

The Code demonstrates to our patients and communities that Bassett Medical Center has strong values and can be relied upon to act in an ethical and compliant manner. Thank you for your ongoing commitment to our patients, our communities and Bassett Medical Center’s continued reputation for excellence and integrity.

*William LeCates, M.D.
President*

It is expected that all employees of Bassett Medical Center will support and fully comply with the mission, vision, and values of Bassett Healthcare Network. It is also the expectation that all employees will work in an ethical manner and will abide by the Code of Conduct.

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Bassett Medical Center is committed to conducting business in an ethical and honest manner and within the bounds of the law. This Code of Conduct is intended to provide employees, physicians, volunteers, vendors, and other agents of Bassett Medical Center with guidelines for conducting business in a manner which fulfills that commitment. The Code of Conduct is supplementary to the mission, vision and values of Bassett Healthcare Network and applies to all who provide services under the auspices of Bassett Medical Center.

The standards contained in this Code of Conduct are important, and therefore any violation will be handled in accordance with the Human Resource policy Counseling and Conduct or other applicable policies and procedures of Bassett Medical Center. In addition, referral of certain matters will be made to government and regulatory agencies as appropriate. The offender may also be responsible in a civil suit for losses or other damages caused by his or her inappropriate conduct.



Compliance Resources and Contact Information

If you have questions or encounter any situation that you feel violates Bassett Medical Center's Code of Conduct, immediately consult your supervisor, the Corporate Compliance Officer, or the Compliance Department. You may also report compliance concerns anonymously to the Compliance Hotline.

Compliance Department:

Jack D. Hogan, J.D., MBA-HM, CHC
Corporate Compliance Officer
Phone: 607-547-7259
E-mail: john.hogan@bassett.org

Compliance Hotline: 607-547-3017

Compliance Intranet Site:

<http://online2.bassett.org/CorporateCompliance/>

Policies Referenced in this Code

- 2-C Code of Ethics
- 33-C Conflict of Interest Policy Statement
- 40-C Compliance
- 48-C Compliance Investigation, Corrective Action, & Discipline
- 64-C Exclusion Checks
- 67-C Detection and Prevention of Fraud, Waste, and Abuse and Applicable Federal and State Laws
- 68-C Business Courtesies to Potential Referral Sources
- 74-C Compliance Hotline and Reporting
- 8.Y-HR Conflict Management in Leadership
- 80-C Vendor Relations
- 8.J-HR Non-Retaliation
- 1-CL Confidential Information and Acceptable Use of Bassett Information Resources
- 20-CL Disruptive Conduct by Medical Staff
- 8.N-HR Counseling and Conduct

Code of Ethics

Bassett is a rural academic medical center deeply committed to human dignity, confidentiality and the building of relationships in providing excellence in healthcare services, educating physicians and other health care professionals, and pursuing health research. Overall ethical behaviors are guided by the mission, values, and vision statements of Bassett Healthcare Network.

The Medical Board and the Board of Trustees of Bassett Medical Center have established the Code of Ethics in recognition of the institution's responsibility to our patients, staff, physicians, and the community we serve. It is the responsibility of every member of Bassett Medical Center- Medical Board, Administration, Board of Trustees, employees- to act in a manner that is consistent with this organization statement and its supporting policies.

Our behavior will be guided by the following general principles:

- ✓ All patients, employees, students, volunteers, and visitors deserve to be treated with dignity, respect, and courtesy.
- ✓ In all of the various settings in which this organization provides patient services, evidence-based standards of care will be utilized and patient expectations for care, regardless of the patient's ability to pay, will be consistently met.
- ✓ Professional staff shall conduct their practice within the scope of their licenses and the privileges accorded to them through Bassett's appointment and credentialing processes.
- ✓ Patients (or their health care agent, surrogate, or appropriate family member) will be involved in the decision making for the care that is delivered.
- ✓ Practitioners and other staff within their scope of practice also seek to inform all patients about the therapeutic alternatives and the risks and benefits associated with the care they are seeking.
- ✓ In all circumstances, patients will be treated in a manner that respects their cultural, religious, and language needs.
- ✓ The New York State Patients' Bill of Rights and the New York State Parents' Bill of Rights guides our behavior with patients and their families. The New York State Patients'

Bill of Rights and the New York State Parents' Bill of Rights is distributed to patients upon admission and is posted conspicuously in public areas. Bassett disseminates information publicly to teach its employees, patients, families, and community members about advance directives, health care agents, and other topics related to patient rights.

- ✓ Bassett recognizes that patients, family members, visitors, community members, employees, volunteers, and medical staff have the right to register comments about care and services without the fear of reprisal. Concerns shall be promptly acknowledged and investigated. All complaints shall be resolved to the fullest extent possible.
- ✓ Bassett acknowledges every patient's freedom to choose alternative facilities or methods of care. Patients will be notified of any Bassett association with alternative facilities.
- ✓ Clinical research is conducted ethically, in a manner that protects and respects the rights of patients, and in compliance with federal and state laws and regulations. Patients have the right to withdraw at anytime from a research study and shall not have their care impacted in any way.
- ✓ The material and financial resources of the institution will be managed with integrity and honesty, following best

practices and principles of sound stewardship.

Mission

Who we are

Bassett Healthcare Network's mission is improving the health of our patients and the well-being of our communities.

Vision

Where we're going

To provide high quality healthcare through integrated and clinically advanced services.

To be a model of excellence for rural health.

To maintain a unique presence in academic medicine and research.

Values

What we believe in

- Compassion
- Teamwork
- Service
- Accountability
- Relationships
- Learning

- Integration

The Compliance Program:

The Compliance Program has been established to prevent the occurrence of illegal or unethical behavior, to stop any such behavior as soon as reasonably possible after it has been discovered, to discipline the individuals involved (including those who know of violations but fail to report them), and to recommend and implement changes in policy and procedure necessary to avoid a recurrence of any prior violation.

Report Violations:

It is important to Bassett that employees have an effective way to get an answer to any question they may have about how to conduct their jobs. It is also important for employees and other agents to report any instance of a known or suspected violation of this Code of Conduct.

In the event that an employee has a question or concern or believes that someone is conducting their business in an illegal, unethical, or otherwise questionable manner, or violating Bassett's policies, it is preferred that the employee first contact his or her supervisor to discuss the matter. There are times, however, when either the response the employee receives may be inadequate or the employee may feel uncomfortable in discussing the matter with his or her supervisor. In those cases, the employee should contact the Corporate Compliance Officer or call the

Compliance Hotline- 607-547-3017

All calls to the hotline are confidential, and the caller may remain anonymous. Follow up on calls is available by a return call to the hotline. In addition to other monitoring tools, Bassett relies on its employees and health care professionals to report coding, billing, and other compliance concerns. Employees, who, in good faith, report a possible violation of law, regulation, policy, or procedure, will not be subjected to retaliation, retribution, or harassment. An employee who knowingly and purposefully misinforms the organization or falsely reports an issue is subject to disciplinary action up to, and including termination of employment. Any employee who conducts or condones

retribution, retaliation, or harassment in any way will be

subject to discipline, up to and including discharge.

Bassett Medical Center's Commitment to Compliance:

Bassett strives to:

Comply with the Law

Bassett is subject to numerous local, state, and

federal laws pertaining to all aspects of its operation. Employees are required to understand and abide by those laws which are applicable to them in the performance of their jobs.

Provide Excellent Patient Care

Bassett employees shall strive to treat patients with empathy, kindness, and compassion. Each patient is an individual and should be treated as such. Each patient should be respected, with his or her needs and desires considered as health care decisions are made. Steps shall be taken so that each patient

understands his or her treatment needs and options, treatment methods utilized, and treatment outcomes. Bassett will provide services in a manner that does not discriminate against any other person because of age, race, religion, gender identity and expression, sex, sexual orientation, disability, national origin, source of payment or for any other reason prohibited by applicable state and federal law. At all times, competent and qualified individuals will provide appropriate care, while considering the safety and well being of the patients.

Protect Confidential Information

Bassett is committed to maintaining the confidentiality of patient, personnel, and other proprietary information in accordance with

applicable legal and ethical standards.

Every employee, student, affiliate, contractor, and volunteer must sign a Confidentiality Agreement when first coming to Bassett and annually. All confidential information should only be accessed and used as needed to perform job responsibilities. Any misuse of confidential information or failure to

termination, and may even result in personal civil and criminal legal liability.

Manage Conflict in Leadership

Bassett strives to offer an environment in which communication is open and frequent. However, conflict is sometimes an inevitable part of human interaction. For Bassett leadership groups, conflict may occur due to the dynamic nature of healthcare, scarcity of resources, and the diversity of opinion which we seek, and it can be positive. For assistance in conflict management in leadership, please reference Policy 8.Y-HR.

Hold Employees Accountable

There are certain behaviors and actions that the organization will not tolerate. Unacceptable behaviors will result in immediate disciplinary action. The Policy on Counseling and Conduct (8.N- HR) lists unacceptable behaviors and provides guidelines on holding people accountable for their behaviors. Respecting staff is very important at Bassett, so emphasis is on educating colleagues about appropriate conduct and behavior, while having a system that provides feedback to improve if needed. In all cases, it is the responsibility of the employee to meet the conduct and performance expectation at Bassett in conjunction with living the Mission, Vision, and Values.

Prohibit Disruptive Conduct

comply with the Confidentiality Agreement may result in disciplinary action, up to and including

It is the policy of Bassett that all persons within its facilities be treated with courtesy, respect, and dignity. To that end, all medical staff members shall conduct themselves in a professional and cooperative manner. Medical staff members who engage in unacceptable disruptive conduct shall be subject to disciplinary action in accordance with the

corrective action procedures set forth in the Bassett Medical Center Medical Staff Bylaws.

Bassett strives to:

Adhere to Anti-Referral and Health Care Fraud and Abuse Legislation

Employees of Bassett are required to comply with laws which prohibit health care fraud and abuse. Activities that are prohibited include, but are not limited to:

- Intentionally or knowingly making false or fraudulent claims for payment or approval;
- Offering or receiving remuneration (such as kickback, bribe, or rebate) as an inducement to make a referral for the furnishing (or arranging for the furnishing) of any item or service;
- Submitting false information for the purpose of gaining or retaining the right to participate in a plan or obtain reimbursement for services; and,
- Referrals by a physician of Medicare or Medicaid patients to any entity for “designated health services” when the physician or an immediate family member has a financial relationship with the entity (unless the arrangement complies with applicable legal exceptions).

Not Accept Inappropriate Gifts or Gratuities

The following standards apply to the giving or receiving of gifts and gratuities.

Receiving Gifts from Patients and Vendors:

Employees are prohibited from accepting gifts or entertainment from persons or vendors that do or are seeking to do business with the hospital with a value in excess of \$100 or that might be considered by an objective observer to have the potential for influencing his or her conduct of business on behalf of the hospital. Gifts of money are never permissible. This is not intended to prohibit the

exchange of social amenities or business courtesies of a nominal value, consistent with good taste and mature judgment.

Gifts from pharmaceutical and medical device manufacturers to Medical Staff are prohibited.

In circumstances where vendors or patients wish to provide a gift in support of the mission of the organization, they should be directed to the Friends of Bassett.

Giving Gifts to Patients and Vendors:

The federal Anti-Kickback Statute prohibits the knowing and willful solicitation or receipt, offer or payment, overtly or covertly, directly or indirectly, of any remuneration (anything of value) in return for patient, product, or service referrals, or to induce such referrals. This prohibition extends to arranging for, recommending, or approving any purchase, lease or order of any goods and services that could potentially be reimbursed by Medicare or any state health care program.

An employee who is in doubt about whether a situation involving the giving or receiving of something of value is acceptable, should ask the Corporate Compliance Officer.

Avoid Conflicts of Interest

It is the policy of Bassett to prohibit its employees and other associates from engaging in any activity practice, or act which conflicts with, or appears to conflict with, the interests of Bassett, its patients, or its vendors. Therefore, Employees, Medical Staff members, Board members, and other individuals must disclose to their supervisor or the Corporate Compliance Officer any potential conflict of interest they or their immediate family have in any firm which does business with Bassett or which competes with Bassett.

Follow Antitrust Regulations

A number of activities engaged in by the Bassett are subject to state and federal antitrust laws. Generally, these laws prohibit agreements or actions that may illegally restrain trade or reduce competition. Examples of activities that violate these laws include, but are not limited to, agreements among competitors to fix or stabilize

prices, inappropriate exclusive dealings, and boycotts of specified suppliers or customers. Sharing information with a competitor, such as how prices are set, labor costs, or terms of supplier contracts may also violate anti-trust laws.

Bassett strives to:

Keep Accurate and Complete Records

It is essential that Bassett report accurate

information to governmental entities and other third parties. In order to meet this obligation, it is equally essential that every employee accurately and clearly report the relevant facts or the true nature of a transaction. No employee should knowingly or with reckless disregard for the truth make any false or misleading statement on any form or to any other officer, employee or auditor for Bassett. All patient records must meet the documentation standards required for quality care and to meet reimbursement regulations. Any individual who contributes to the medical record must provide accurate documentation and never alter or destroy anything that is a part of the official medical record. Employee travel and entertainment related expenses must be accurately documented and supported when seeking reimbursement from the hospital. Medical records and other business documents will be retained in accordance with state and federal law.

Conduct Political Activities According to the Law

Bassett does not participate or intervene in (including the publishing or distributing of statements), any political campaign on behalf of or in opposition to any candidate for public office. The organizational prohibition on political campaign activity is not intended to restrict free expression on political matters by employees, medical staff, Board of Trustees members or other representatives of Bassett speaking for themselves, as individuals. Bassett may participate in lobbying activities or advocating the passage or defeat of certain legislation that pertains to issues that affect the healthcare community. Lobbying activities, or advocating the passage or defeat of certain legislation, shall not constitute a substantial part of the activities of Bassett.

Protect the Environment

It is the policy of Bassett to comply with state and federal laws protecting the environment. Employees shall dispose of all waste and other materials and store all chemicals and substances in accordance with applicable laws and regulations. It is important to file all necessary environmental reports accurately and promptly and to cooperate fully with all governmental authorities in the event of any environmental incident.

Provide a Safe Workplace

It is the policy of Bassett to comply with applicable state and federal laws designed to improve workplace safety. Bassett is committed to training employees to carry out their work in a manner that is safe for them, their coworkers, and the patients they serve. Bassett does not employ or contract with individuals or entities that are excluded or ineligible to participate in federal healthcare programs, suspended or debarred from federal government contracts, or have been convicted of a criminal offense related to the provision of healthcare items or services and have not yet been reinstated in a federal healthcare program, provided we are aware of such criminal offense.

Not Tolerate Harassment or Discrimination

It is Bassett's policy not to discriminate on the basis of race, color, religion, national origin, age, disability, sex, sexual orientation, source of payment or gender identity and expression in providing services to patients or the public, nor in relation to employment practices. Furthermore, Bassett prohibits harassment of its employees in any form by supervisors, coworkers, customers, or vendors.

Appropriately Use its Assets

Employees are charged with protecting and preserving Bassett's assets and resources by following procedures to prevent their loss, theft, or unauthorized use. No part of the net earnings of Bassett shall inure to the benefit of, or be distributed to, its trustees, executive staff, employees, or other private persons having directly

or indirectly any personal or private interest in the activities of Bassett, except to the extent that such payments constitute reasonable compensation for services rendered in the necessary course of Bassett's business.

connection with Bassett's business must be properly licensed and used in accordance with that license. Additionally, Bassett will respect the intellectual property and copyright laws regarding books, trade journals, magazines, and other applicable resources.

Bassett strives to:

Protect Access to Information Systems

Bassett is committed to protecting all aspects of its information systems. Employees and other associates with access to Bassett's computerized information system shall sign a Confidentiality Agreement and abide by Bassett's Management of Confidential Information policy, including the protection of confidential passwords and other access information.

Adhere to Intellectual Property Laws

Bassett is committed to adhering to all applicable intellectual property laws. Software used in



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***Compliance Hotline:
607-547-3017***