



## Bassett Healthcare Network

# Code of Conduct

### Message from our President and Chief Executive Officer

*Over the past century, we have been a beacon of hope and healing for our communities. Patients and professionals from across our region and beyond are attracted to Bassett because of what we stand for, what we represent, and who we are. Our reputation as a premier health system wasn't built overnight, it has been decades in the making and a demonstration of resiliency, fortitude, excellence, and integrity. We are inspired by our mission to serve others, and in many cases, serving our community means serving our family, friends, and neighbors while instilling trust in those who need us.*

*Building trust is not just about providing excellent care and service. Trust is also achieved by adhering to our commitments, through honorable and ethical conduct, grounded in the values we hold true and constantly aiming to act with the highest degree of integrity. This guides our behaviors, actions, and decisions, far beyond mere compliance with laws and regulations, and is part of the fabric of who we are as accountable caregivers at Bassett, integrating ethical principles and decision making into everything we do and every situation we encounter. This starts at the highest level, consistent for directors and executives, leading by example and embracing an open and transparent culture, and is the responsibility for all of us privileged and proud to represent the Bassett Healthcare Network. This type of culture, in it of itself, is critical to maintaining our trust with patients, partners, and many other stakeholders, sharpening our competitive advantage and driving long-term growth, and reflects a day-to-day commitment. Building on that commitment, the following pages are intended to support you by providing a framework for guiding your behaviors, actions, and decisions 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 your local compliance resource. 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 have, without fear of retaliation, and for raising concerns we believe may be a violation of our Code of Conduct.*

*This Code of Conduct reflects our strong reputation of caring for our patients and communities. Your adherence is absolutely critical to our future and to strengthening our ethical culture, one decision and action at a time.*

*Dr. Tommy Ibrahim  
President and CEO*

*It is expected that all Covered Persons of Bassett will support and fully comply with the mission, vision, and values of the organization. It is also the expectation that all Covered Persons will work in an ethical manner and will abide by the Code of Conduct. If you encounter a situation that violates this Code, immediately consult your supervisor, or your local compliance resource.*

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Bassett 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, board members, volunteers, vendors, affiliates, contractors and other agents of Bassett (Covered Persons) 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 and applies to all who provide services under the auspices of Bassett.

The standards contained in this Code of Conduct are important, and therefore any violation will be handled in accordance with applicable Human Resource policies and procedures of Bassett. 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

Each of Bassett's subsidiaries has a dedicated compliance liaison who reports through the Bassett Corporate Compliance Officer. Bassett Healthcare Network, as a not-for-profit parent corporation, exercises oversight of these subsidiary compliance programs. Therefore, if you have questions or encounter any situation that you feel violates Bassett's Code of Conduct, immediately consult your supervisor, your compliance liaison, or the Compliance Department. You may also report compliance concerns anonymously to the Compliance Hotline, or to the Chair of the Bassett Healthcare Network Audit Committee of the Board. On the last page you will find a list of compliance resource information.

### *Compliance Department:*

Jack D. Hogan, JD, MBA, CHC  
Vice President, Corporate Compliance  
Phone: 607-547-7259  
E-mail: [john.hogan@bassett.org](mailto:john.hogan@bassett.org)

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## Code of Ethics

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Bassett is an integrated healthcare system 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.

The Board of Directors of Bassett 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 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:

- ✓ Everyone deserves 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 Covered Persons, 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, and Covered Persons 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 any time 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's mission is improving the health of our patients and the well-being of our communities.

## Vision

### Where we're going

Through advanced integrated clinical services, education, and research, we aspire to be a model of excellence for health, creating remarkable patient experiences and better living.

## Values

### What we believe in

- Courage
- Unity
- Excellence

## *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 all Covered Persons 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 Covered Persons and other agents to report any instance of a known or suspected violation of this Code of Conduct.

In the event that a Covered Person has a question or concern or believes that someone is conducting their business in an illegal, unethical, or otherwise questionable manner, or violates Bassett's policies, it is preferred that the Covered Persons first contact his or her supervisor to discuss the matter.

There are times, however, when either the response the Covered Person receives may be inadequate or the Covered Person may feel uncomfortable in discussing the matter with his or her supervisor. In those cases, the Covered Person should contact the Compliance Officer or call the Compliance Hotline.

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## ***Compliance Hotline***

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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 Covered Persons and health care professionals to report coding, billing, and other compliance concerns. Covered Persons, who, in good faith, report a possible violation of law, regulation, policy, or procedure, will not be subjected to retaliation, retribution, or harassment. A Covered Person 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 Covered Person who conducts or condones retribution, retaliation, or harassment in any way will be subject to discipline, up to, and including, discharge.

## Bassett'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. Covered Persons 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 Covered Persons 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 wellbeing of the patients.

#### *Protect Confidential Information*

Bassett is committed to maintaining the confidentiality of patient, personnel, and other proprietary information in accordance with all state and federal privacy laws, including the Health Insurance Portability and Accountability Act (HIPAA), and ethical standards.

Every Covered Person 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 comply with the Confidentiality Agreement may result in disciplinary action, up to, and including, 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. It is critical that we maintain the utmost respect and collegiality in our communications with our colleagues.

#### *Hold Covered Persons Accountable*

There are certain behaviors and actions that the organization will not tolerate. Unacceptable behaviors will result in immediate disciplinary action. 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 Covered Person to meet the conduct and performance expectation at Bassett in conjunction with living the Mission, Vision, and Values.

#### *Prohibit Disruptive Conduct*

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 Bassett's policies.

**Bassett strives to:**

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

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Covered Persons 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).

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**Not Accept Inappropriate Gifts or Gratuities**

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

*Receiving Gifts from Patients and Vendors:* Covered Persons are prohibited from accepting gifts or entertainment from persons or vendors that do or are seeking to do business with Bassett 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 Bassett. 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.

A Covered Person who is in doubt about whether a situation involving the giving or receiving of something of value is acceptable, should ask the Compliance Officer.

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**Avoid Conflicts of Interest**

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It is the policy of Bassett to prohibit its Covered Persons 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, Covered Persons 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.

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**Follow Antitrust Regulations**

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A number of activities engaged in by 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:**

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### ***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 Covered Person accurately and clearly report the relevant facts or the true nature of a transaction. No Covered Person should knowingly or with reckless disregard for the truth make any false or misleading statement on any form or to any other officer, Covered Person 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. Covered Person's travel and entertainment related expenses must be accurately documented and supported when seeking reimbursement from Bassett. Medical records and other business documents will be retained in accordance with state and federal law.

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### ***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 Covered Persons 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.

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### ***Protect the Environment***

It is the policy of Bassett to comply with state and federal laws protecting the environment. Covered Persons 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.

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### ***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 Covered Persons 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.

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### ***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 Covered Persons in any form by supervisors, coworkers, customers, or vendors.

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### ***Appropriately Use its Assets***

Covered Persons 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, Covered Persons, 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.

**Bassett strives to:**

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***Protect Access to Information Systems***

Bassett is committed to protecting all aspects of its information systems. Covered Persons and other associates with access to Bassett's computerized information system shall sign a Confidentiality Agreement and abide by Bassett's information security policies and procedures. Remember, do not share passwords, leave laptops unattended, or download unapproved software to our information systems.

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***Adhere to Intellectual Property Laws***

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

Facility	Compliance Liaison	Email Address	Phone	Hotline
A.O. Fox Hospital	Laura Palada	<a href="mailto:laura.Palada@aofmh.org">laura.Palada@aofmh.org</a>	607-431-5045	800-273-8452
At Home Care	Christina McCoy	<a href="mailto:cmcoy1@ahcnys.org">cmcoy1@ahcnys.org</a>	607-432-7924	844-490-0002
Bassett Medical Center and Bassett Healthcare Network*	Jack Hogan	<a href="mailto:john.hogan@bassett.org">john.hogan@bassett.org</a>	607-547-7259	607-547-3017
Cobleskill Regional Hospital	Susan Franko	<a href="mailto:susan.franko@bhsc.org">susan.franko@bhsc.org</a>	518-254-3363	518-254-3499
First Community Care	Betty Horrigan	<a href="mailto:bhorrigan@Americoastllc.com">bhorrigan@Americoastllc.com</a>	607-547-2173	800-699-9606
Little Falls Hospital	Jack Hogan	<a href="mailto:john.hogan@bassett.org">john.hogan@bassett.org</a>	607-547-7259	607-547-3017
O'Connor Hospital	Jack Hogan	<a href="mailto:john.hogan@bassett.org">john.hogan@bassett.org</a>	607-547-7259	607-547-3017
Valley Health Services	Peter Bizzari	<a href="mailto:pbizzari@valleyhealthservices.org">pbizzari@valleyhealthservices.org</a>	315-866-3330 ext. 2282	315-866-3330 ext. 2900
*Bassett Healthcare Network Corporate Compliance Officer				