



Code of Conduct

Message from our President:

At Cobleskill Regional Hospital (CRH) you are part of an organization with a proud history of caring for the people of Schoharie County. Generations of dedicated employees have worked at CRH carrying forth the organization's founding mission of serving the community. 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 objective surveys that confirm our leadership in quality and patient satisfaction.

Every person at CRH plays a role, directly or indirectly, in the patient experience and 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 with us.

To help you with the legal and ethical questions you may encounter in your daily work, we have prepared the CRH Code of Conduct (Code). This Code is the cornerstone of the CRH 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, or the Compliance Officer. You also have the option to report compliance concerns anonymously to the compliance hotline (518-254-3499). 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 the employees of CRH will support and fully comply with the mission, vision, and values of the organization. It is also the expectation that all employees will work in an ethical manner and will abide by the Code of Conduct.

Thank you for your ongoing commitment to our patients, our communities and CRH's reputation for excellence and integrity.

*Eric H. Stein, FACHE
President*

Mission

Improving the health of our patients and the well-being of our communities.

Vision

To provide high quality health care 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

Compassion

Teamwork

Service

Accountability

Relationships

Learning

Code of Conduct

CRH 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, students and vendors 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 CRH and applies to all who provide services under the auspices of CRH.

The standards contained in this Code of Conduct are important and therefore any violation will be handled in accordance with the Human Resources policies outlined in the Employee Handbook, or other applicable policies and procedures of CRH. In addition, referral of certain matters will be made to government and regulatory agencies as appropriate and individuals may be named in civil suits for losses or other damages caused by their inappropriate conduct.

If you have questions or encounter any situation that you feel violates CRH's Code of Conduct, immediately consult your supervisor or the Compliance Officer.

Chief Compliance Officer:

Susan M Franko, PhD, RRT

Phone: 518-254-3363

Compliance Hotline: Report compliance concerns anonymously at **(518) 254-3499**.

Code of Conduct

CRH is a community hospital deeply rooted to commitment, confidentiality, and relationships in excellence of healthcare services. Overall ethical behaviors described in this Code of Conduct are guided by the mission, vision and commitment of CRH.

The CRH Board of Trustees has established the Code of Conduct in recognition of the hospital's responsibility to our patients, employees, physicians, and the community we serve. It is the responsibility of every member of CRH 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, medical staff, 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, we will consistently utilize evidence-based standards of care and strive to meet each patient's expectations for care, regardless of the patient's ability to pay.
- Professional staff members conduct their practice within the scope of their licenses and the privileges granted to them through CRH's appointment and credentialing processes.
- Patients (or their health care agent, surrogate, or appropriate family member) will be involved in decision making regarding the care that we deliver.
- All patients will be informed about the risks, benefits and alternatives associated with the care they are seeking.
- In all circumstances, all patients will be treated in a manner that respects their cultural, ethical, religious, and language needs.
- The New York State Patient Bill of Rights guides our behavior with patients and their families. The New York State Patient Bill of Rights is distributed to patients upon admission and is posted conspicuously in public areas. CRH 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.
- We recognize 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. We acknowledge these concerns and will promptly investigate and address all complaints to the fullest extent possible.
- We acknowledge every patient's freedom to choose alternative facilities or methods of care and will disclose whether CRH is associated with any of them.
- The material and financial resources of the institution will be managed with integrity and honesty, following best practices and principles of sound stewardship.

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 educate the individuals involved (including those who know of violations but fail to report them), disciplining employees when necessary, 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 CRH that employees have a way to communicate their concerns and get a response to questions they have about the code of conduct and compliance matters. It is also important for employees and other agents to report any instance of a known or suspected violation of this Code of Conduct.

If an employee has a question, concern, or suspects illegal, unethical, or otherwise questionable behavior, or violation(s) of CRH's policies, it is preferred that the employee first contact his or her supervisor to discuss the matter. If the employee is not satisfied, or uncomfortable discussing the matter with his or her supervisor, the employee should contact the Compliance Officer or call the ***Compliance Hotline*** at ***(518) 254-3499***.

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, CRH relies on its employees and providers 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. Any employee who conducts or condones retribution, retaliation, or harassment in any way will be subject to discipline, up to and including termination.

CRH's Commitment to Compliance

CRH shall:

Comply with the Law

CRH is subject to numerous 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

CRH employees shall strive to treat patients with empathy, kindness, and compassion. Each patient is an individual and should be treated with respect. Steps shall be taken so that each patient understands his or her treatment needs and options, treatment methods utilized and treatment outcomes so that each patient has enough information to make an informed health care decision. CRH will provide services in a manner that does not discriminate against any other person because of age, race, religion, gender, sexual orientation, disability, national origin, 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

CRH is committed to maintaining the confidentiality of patient, employee and other proprietary information in accordance with applicable legal and ethical standards.

Every workforce member including employees, students, affiliate, contractor, and volunteer must sign a Confidentiality Agreement when first coming to CRH and annually thereafter. All confidential information will be accessed and used as needed to perform job responsibilities in accordance to the minimum necessary standard. Any misuse of confidential information or failure to comply with the Confidentiality Agreement may result in disciplinary action, up to and including termination of employment, and could result in personal civil and criminal legal liability.

Manage Conflict in Leadership

CRH strives to offer an environment in which communication is open and frequent. However, conflict is sometimes inevitable. Conflict may occur due to the dynamic nature of healthcare, scarcity of resources, and the diversity of opinion which we seek; conflict can be positive in nature. For assistance in conflict management please refer to the Human Resources Employee Handbook.

Hold Employees Accountable

There are certain behaviors and actions that the organization will not tolerate. Unacceptable behaviors will result in immediate disciplinary action. The Human Resources Employee Handbook lists unacceptable behaviors and provides guidelines on holding people accountable for their behaviors. Respecting each other is very important at CRH, 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 CRH in conjunction with living the Mission, Vision, and Values.

Prohibit Disruptive Conduct by Providers

The Code of Conduct requires all persons within our 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 CRH Medical Staff Bylaws.

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

CRH expects that all employees, members of its medical/dental staff business partners and anyone CRH does business with will 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 and 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 immediate family member has a financial relationship with the entity (unless the arrangement complies with applicable legal exceptions).

Decline Gifts from Vendors

It is the policy of Cobleskill Regional Hospital (CRH) that employees decline to accept personal gifts, gratuities, services, or discounts of more than nominal value from existing or potential vendors. All purchasing decisions and business relationships are based on objectivity, optimizing financial benefit to the hospital and that all purchasing decisions and business relationships not be influenced by personal gain of any kind.

Employees are required to report to the Director of Materials Management any gifts or gratuities of more than nominal value which may be offered by any vendor. Questions regarding the value of gifts, services, discounts, or gratuities are reviewed with Senior Staff and/or the Director of Materials Management.

Any employee or agent of CRH in connection with the selection of a vendor or in active negotiations with a vendor shall not accept any gratuities, regardless of value, from that vendor. Any legally authorized discount or rebate provided by the vendor should be applied as a reduction in purchase price paid by CRH.

The Director of Materials Management will be responsible for sharing the Hospital’s vendor policy with all business partners of the Hospital.

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.

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

Avoid Conflicts of Interest

It is the policy of CRH 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 CRH, its patients, or its vendors. Therefore, employees, Medical Staff members, board members, and other individuals in decision-making positions must disclose annually, through a Related Party Questionnaire, any potential conflict of interest they or their immediate family have in any firm which does business with CRH or which competes with Bassett Healthcare Network. Such disclosures shall be retained in the Administration Office.

Follow Antitrust Regulations

A number of activities engaged in by CRH are subject to state and federal antitrust laws. Generally, these laws prohibit agreements of 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-trusts laws.

Keep Accurate and Complete Records

It is essential that CRH 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 CRH. 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

CRH 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 CRH speaking for themselves, as individuals. CRH may participate in some lobbying activities but will not engage in a substantial amount of lobbying activities, or advocating the passage or defeat of certain legislation.

Protect the Environment

CRH will 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

CRH will comply with applicable state and federal laws designed to improve workplace safety. CRH 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. CRH 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

CRH does not discriminate on the basis of race, color, religion, national origin, age, disability, sexual orientation, gender, or any other protected status in providing services to patients or the public, nor in relation to employment practices. Furthermore, CRH prohibits harassment of its employees in any form by providers, supervisors, coworkers, customers, or vendors.

Use Assets Appropriately

Employees are charged with protecting and preserving CRH's assets and resources by following procedures to prevent their loss, theft, or unauthorized use as defined by the confidentiality agreement. No part of the net earnings of CRH 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 CRH except to the extent that such payment constitute reasonable compensation for services rendered in the necessary course of CRH's business.

Protect Access to Information Systems

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

Adhere to Intellectual Property Laws

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

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