



Bassett Healthcare Network
Little Falls Hospital

Code of Conduct

Message from our President

At Little Falls Hospital you are part of an organization with a proud history of caring for people throughout Central New York. For more than 125 years, generations of dedicated employees have worked at Little Falls, carrying forth our organization's founding mission of offering quality care, with compassion, to all who need our services. 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 Little Falls 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 Little Falls Hospital Code of Conduct (Code). This Code is the cornerstone of the Little Falls 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 Compliance Officer. You also have the option to report compliance concerns anonymously to the compliance hotline (315-823-5205). 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 Little Falls Hospital 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 Little Falls Hospital's continued reputation for excellence and integrity.

Michael L. Ogden
President

It is expected that all employees of Little Falls Hospital 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.

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Little Falls Hospital 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 Little Falls Hospital 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 Little Falls Hospital and applies to all who provide services under the auspices of Little Falls Hospital.

The standards contained in this Code of Conduct are important, and therefore any violation will be handled in accordance with the Human Resource policy Discipline and the Performance Improvement Plan (PIP) or other applicable policies and procedures of Little Falls Hospital. 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 Little Falls Hospital's Code of Conduct, immediately consult your supervisor or the Compliance Officer. You may also report compliance concerns anonymously to the Compliance Hotline.

Compliance Officer:

Pat Zawko

Director of Quality Resources and Risk Management & Compliance Officer

Phone: 315-823-5370

E-mail: p.zawko@lfhny.org

Compliance Hotline: 315-823-5205

Policies Referenced in this Code

- Code of Ethics
- Conflict of Interest
- Compliance
- Exclusion Checks
- Detection and Prevention of Fraud, Waste, and Abuse and Applicable Federal and State Laws
- Federal False Claims Act and Whistleblower
- Acceptance of Gifts by Employees from Vendors
- Compliance Communication/Compliance Hotline
- Conflict Management in Leadership
- Health Care Vendor Relations
- Non-Harassment
- Non-Discrimination
- Management of Confidential Information
- Disruptive Conduct by Medical Staff
- Discipline and the Performance Improvement Plan (PIP)

Code of Ethics

Little Falls Hospital is a rural Critical Access Hospital deeply rooted to commitment, confidentiality, and relationships in excellence of healthcare services. Overall ethical behaviors are guided by the mission, values, and vision statements of Little Falls Hospital.

The Board of Trustees of Little Falls Hospital has 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 the Board of Trustees, Administration, Physicians, 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, 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 meet patient's expectations for care, regardless of the patient's ability to pay.
- ✓ Professional staff conducts their practice within the scope of their licenses and the privileges accorded to them through Little Falls 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.
- ✓ We will 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, we will treat patients in a manner that respects their cultural, 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. Little Falls Hospital 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 all of these concerns. We will promptly investigate and resolve all complaints to the fullest extent possible.
- ✓ We acknowledge every patient's freedom to choose alternative facilities or methods of care and will notify them as to whether Little Falls 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.

Mission

Who we are

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

Vision

Where we're going

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

What we believe in

Compassion

Teamwork

Service

Accountability

Relationships

Learning

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 Little Falls Hospital 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 Little Falls Hospital'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 Compliance Officer or call the Compliance Hotline.

Compliance Hotline- 315-823-5205

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, Little Falls 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.

Little Falls Hospital's Commitment to Compliance:

Little Falls Hospital strives to:

Comply with the Law

Little Falls Hospital 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

Little Falls Hospital 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. Little Falls Hospital 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

Little Falls Hospital 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 Little Falls Hospital 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

Little Falls Hospital strives to offer an environment in which communication is open and frequent. However, conflict is sometimes an inevitable part of human interaction. For Little Falls 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 the policy Conflict Management in Leadership.

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 Discipline and the Performance Improvement Plan (PIP) list unacceptable behaviors and provide guidelines on holding people accountable for their behaviors. Respecting staff is very important at Little Falls Hospital, 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 Little Falls Hospital in conjunction with living the Mission, Vision, and Values.

Prohibit Disruptive Conduct

It is the policy of Little Falls Hospital 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 Little Falls Hospital Medical Staff Bylaws.

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

Employees of Little Falls Hospital 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.

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 Development Office.

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 Compliance Officer.

Avoid Conflicts of Interest

It is the policy of Little Falls Hospital 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 Little Falls Hospital, its patients, or its vendors. Therefore, Employees, Medical Staff members, Board members, and other individuals must disclose to their supervisor or the Compliance Officer any potential conflict of interest they or their immediate family have in any firm which does business with Little Falls Hospital or which competes with Little Falls Hospital.

Follow Antitrust Regulations

A number of activities engaged in by the Little Falls Hospital 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.

Keep Accurate and Complete Records

It is essential that Little Falls Hospital 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 Little Falls Hospital. 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

Little Falls Hospital 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 Little Falls Hospital speaking for themselves, as individuals. Little Falls Hospital 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 Little Falls Hospital.

Protect the Environment

It is the policy of Little Falls Hospital 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 Little Falls Hospital to comply with applicable state and federal laws designed to improve workplace safety. Little Falls Hospital 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. Little Falls Hospital 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 Little Falls Hospital's policy not to discriminate on the basis of race, color, religion, national origin, age, disability, sexual orientation, or gender in providing services to patients or the public, nor in relation to employment practices. Furthermore, Little Falls Hospital 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 Little Falls Hospital's assets and resources by following procedures to prevent their loss, theft, or unauthorized use. No part of the net earnings of Little Falls Hospital 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 Little Falls Hospital, except to the extent that such payments constitute reasonable compensation for services rendered in the necessary course of Little Falls Hospital's business.

Protect Access to Information Systems

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

Adhere to Intellectual Property Laws

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

***Compliance Hotline:
315-823-5205***