

RESPONSIBLE DEPARTMENT: Corporate Compliance	SUBJECT: Compliance with the Code of Conduct
NUMBER OF PAGES: 2	REPLACES POLICY: N/A
EFFECTIVE DATE: APRIL 2024	POLICY ID. ADM-CC

SCOPE:

This policy applies to all employees at Community Memorial Hospital (CMH), Family Health Centers (FHC), and Specialty Clinics.

PURPOSE:

The purpose of this policy is to adapt a Code of Conduct that provides standards and guidance by which affected individuals shall conduct themselves.

POLICY STATEMENT:

It is the policy of Community Memorial Hospital to adapt a Code of Conduct that provides standards and guidance by which affected individuals shall conduct themselves. The Code of Conduct is a fundamental part of the Hospital's Compliance program and works in conjunction with its Mission, Vision and Values as well as compliance policies and procedures and the compliance program handbook.

Affected individuals should strive to protect and promote patient's rights, quality of care, hospital-wide integrity and ethical business practices. They share in the responsibility to uphold the principles of ethical decision making when carrying out their duties on behalf of the Hospital.

The Code of Conduct is written at a level so that it can be read and understood by all affected individuals. It is made available to both internal and external affected individuals, patients and community members.

The content of the Code of Conduct includes the principles of:

- Quality patient care
- Workplace conduct
- Exclusion screening
- Non-discrimination
- Compliance with Federal, State and local laws and regulations
- Health care fraud and abuse prevention
- Coding and reimbursement
- Accurate and truthful documentation
- Record retention and destruction
- Confidentiality
- Conflict of Interest
- Provider/Hospital business relationships and referrals
- Protection of Crouse Hospital assets
- Gifts and gratuities
- Tax exempt status
- Political/lobbying activity
- Fair compensation
- Marketing
- Social media

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- Prescription drugs and controlled substances
- Environmental health and safety
- Scientific and clinical research
- Government investigations, accreditations and surveys
- Responsibility for reporting
- Non-intimidation/non-retaliation
- Enforcement of the Code of Conduct

PROCEDURE:

The Code of Conduct can be found within the Corporate Compliance Handbook in the Policies and Procedures folder on the shared drive. It can also be found on the Hospital's website; www.communitymemorial.org.

The Corporate Compliance Handbook is reviewed at least annually to determine:

- If the code of conduct has been implemented;
- Whether affected individuals are following the code of conduct;
- Whether the code of conduct is effective, and
- Whether any updates are required.

DOCUMENTATION: Applies to all staff

DEFINITIONS:

- **Affected Individuals:** All persons who are affected by the provider's risk areas including employees, chief executive and other senior administrators, managers, contractors, agents, subcontractors, independent contractors and governing and corporate offices

REFERENCES:

- NYS OMIG Mandatory Provider Compliance Plan, 18 NYCRR § 521.

Approved by:



Jeffery Coakley
President and Chief Executive Officer



Cindy Pelky, BS RN
Corporate Compliance Officer