

Code of Conduct

Mission: Willapa Harbor Hospital provides state of the art, personalized medical and diagnostic treatment to individuals who seek or need quality health care services.

Vision: Working together for a healthier community

PURPOSE OF CODE OF CONDUCT

Willapa Harbor Hospital intends to maintain a patient care and business environment that is compliant with legal and regulatory requirements and that operates according to the highest professional and ethical standards. We require members of the hospital's workforce, defined below, to hold this same high standard as they care for patients and conduct their work activities at or for the hospital. This Code of Conduct sets out standards that have been adopted by the hospital board of commissioners, or that are established by laws and regulations that apply to the hospital district. It has been designed to assure that every workforce members will be aware of what is expected of them when they do their work. Many of the requirements summarized in this Code of Conduct are addressed more fully in the hospital's policies, or in training and materials made available by the hospital's compliance program.

The standards discussed in this Code of Conduct apply to all of the hospital's workforce members, including the hospital's leaders, employees, medical staff members, credentialed practitioners, contracted service providers, volunteers and others who work at or for the hospital. Individuals subject to this Code of Conduct are required to:

- Read the Code and sign the attached acknowledgement card;
- Understand any Code requirements that impact their duties and responsibilities at the hospital;
- Conduct themselves in a manner that is consistent with standards and requirements outlined in this Code; and
- Report any issues of suspected non-compliance with the Code of Conduct to their direct supervisor, their medical staff leader or the Compliance Officer so that the issues can be investigated and resolved.

RESPONSIBILITY OF LEADERS

While all workforce members are obligated to follow the Code of Conduct, our leaders are charged with special responsibility. Our leaders are expected to model ethical and compliant behavior—to set an example that other workforce members can follow. Hospital leaders are expected both to understand

the Code requirements that apply in their areas of responsibility, and to know how to manage and lead so that the hospital's compliance and ethics goals are met. Leaders are expected to be kind, sensitive, thoughtful, and respectful, and to balance their other leadership responsibilities with the hospital's goals of ethical behavior and compliance with laws and regulations. **It is part of their job to assure that ethical and compliant behavior is never sacrificed in the pursuit of other business objectives.**

OUR CODE OF CONDUCT

Willapa Harbor Hospital has adopted the following standards to further its purpose to conduct patient care and business activities in a professional and ethical manner—one that is consistent with legal and regulatory requirements:

I. PATIENT WELL BEING AND QUALITY OF CARE

- **We respect the dignity of each individual and will work to treat our patients and customers with consideration, courtesy and respect; to assure their comfort and convenience; and to recognize accept and respect their diversity.**
- **We will demonstrate sensitivity and responsiveness to our patients and their family members and domestic partners by listening attentively and patiently, and making an effort to fully understand and respond as we are able to their needs.**
- **We will inform patients about treatment alternatives and about the risks associated with each treatment.**
- **We will base care decisions on what is medically necessary and in the best interests of our patients.**
- **We will assure that patient care personnel are properly licensed, credentialed and experienced.**
- **We will support medical decision making by assuring that medical record documentation is legible, accurate, timely and complete, and will only amend or correct medical records in accordance with hospital policy.**
- **We will provide patients with the rights outlined in the conditions of participation for Medicare and Medicaid hospitals.**
- **We will work to create a care environment that supports patient safety and quality health care. Recognizing that errors and adverse events may occur, we will strive to create an atmosphere that encourages inquiry and**

appropriate disclosure, as well as one in which we learn, and apply lessons learned in developing systematic approaches to preventing error and harm.

- **We will not distribute unauthorized materials and information, nor solicit our co-workers, customers or visitors for any purpose that has not been approved by the hospital.**

II. COMPLIANCE WITH LAWS AND REGULATIONS

EMTALA

- **We will provide a screening exam and stabilizing treatment to every person who comes to our hospital campus requesting examination and/or treatment for an emergency condition (including pregnant women who are in labor).**
- **We will not delay a medical screening examination or stabilizing care in order to request patient financial information.**
- **We will only transfer unstable emergency patients who request transfer or for whom we lack the capability or capacity to provide treatment, and only after we have provided necessary stabilizing care.**

KICKBACK AND SELF-REFERRALS

- **We will not offer, give, ask for, or accept anything that has economic value in exchange for referring, arranging for, purchasing or otherwise dealing in any items or services.**
- **We will maintain our business and financial relationships with physicians in a manner that is consistent with the law.**

GOVERNMENTAL DISTRICT REQUIREMENTS

- **We will conduct our activities for the benefit of our patients and of the communities that we serve. Our decisions will be based on what is good for the hospital and will benefit our patients. Our business dealings will be conducted at arms-length.**
- **We will not use hospital resources to support candidates for political office or to lobby for changes in the law.**
- **We will not participate in political campaigns as representatives of the hospital, and will not make political contributions with hospital funds.**

We will not allow campaign activities for political candidates on hospital property.

III. BILLING AND CODING INTEGRITY

- We will only bill insurers and government programs for items and services that have been properly ordered and have been provided to a patient, and that are supported by necessary medical record documentation. Items and service provided for patient convenience may be billed directly to the patient or customer if all required notices of non-coverage are provided as required by applicable law or regulation.
- We will work to ensure that our billing and coding is accurate and in compliance with legal requirements.
- We will promptly correct any discovered billing or coding error.

IV. PRIVACY AND SECURITY OF INFORMATION

- We will handle confidential information carefully, in accordance with legal requirements and hospital policies. We will only share such information with those who have a need and/or right to know.
- We will treat confidential patient information with special care. We will only discuss or share protected patient information with those who have a right or need to know, only if necessary authorizations have been received, and only in a manner consistent with legal requirements. We will avoid discussing protected patient information in public areas.

V. CONFLICTS OF INTEREST

- We will disclose any potential conflicts of interest as required by hospital policy, and will not participate in decision making when a conflict of interest exists.
- We will not give or accept gifts or gratuities from business associates that might create an appearance of impropriety, or might improperly influence business decisions.

VI. MAINTAINING A SAFE HEALTH CARE AND WORK ENVIRONMENT

- We will not discriminate in hiring or employment matters against anyone on the basis of their race, color, national origin, sex, religion, age, sexual orientation, mental or physical disability or veteran's status.

- **We respect the dignity of each individual and will work to treat our colleagues, associates and team members with consideration, courtesy and respect; and to recognize accept and respect their diversity.**
- **We will not engage in harassment of co-workers through unwelcome abusive or offensive conduct, whether verbal, physical or visual.**
- **We will not use drugs or alcohol in an unauthorized or inappropriate manner in the workplace.**
- **We will not engage in any violence or threats of violence in the workplace.**
- **We will not use, carry, store or otherwise have in our possession any weapons in the workplace without the prior written approval of hospital management.**
- **We will not employ, grant privileges to or contract with persons or entities who we know are excluded from participating in Federal Health Care Programs, and will take prompt steps to suspend or terminate our relationship with any person or entity upon learning that they have been excluded.**
- **We will not employ, grant privileges to or contract with persons or entities who have shown abusive behavior as validated by a fair and hospital board approved hospital or medical staff process. We will take prompt steps to suspend or terminate our relationship with any person or entity upon learning that they have been abusive to patients, hospital staff or medical staff colleagues.**

VII. RESEARCH

- **We will conduct all research activities in manner that is consistent with the highest ethical and moral standards, and in accordance with legal and regulatory requirements.**

VIII. STEWARDSHIP OF HOSPITAL PROPERTY AND INTERESTS

- **We are personally responsible and accountable for the proper expenditure of hospital fund, and the proper use of hospital property and equipment that is entrusted to us.**

IX. FINANCIAL REPORTING AND RECORD KEEPING

- **We prepare and maintain all patient and business records and reports accurately and truthfully, following applicable standards for record keeping.**

- **We comply with financial reporting and accounting requirements that pertain to our business, including requirements pertaining to preparation and filing of cost reports with Medicare and other federal health care programs.**
- **We retain records for the periods required by law or hospital policy, and destroy records in a manner that ensures continued security of protected or confidential information.**

X. REPORTING OBLIGATION AND NON-RETALIATION

- **We will report any concerns about possible non-compliance with this Code of Conduct, or with any hospital policy or legal or regulatory requirement that applies to the hospital, to a supervisor, to the compliance officer or to the compliance hotline.**
- **We will not retaliate against anyone who in good faith reports a concern about possible non-compliance.**

If you believe that you have seen or are aware of a situation that violates the requirements of this Code of Conduct, or of any hospital policy or legal requirement, you are required by hospital policy and by this Code of Conduct to take appropriate steps to discuss or report your concern to the hospital so that it can be investigated and, if necessary, appropriate steps can be taken to resolve it. You can meet your obligation to report in any of the following ways:

- **Discuss the concern with your immediate supervisor.** When possible, the existing management structure and lines of authority should be utilized to resolve problems. Your supervisor, in turn, has an obligation to discuss possible serious compliance violations with the hospital's compliance officer.
- **Contact the hospital's compliance officer to discuss your concern.** In some situations it may not be possible to discuss concerns directly with your supervisor—for instance, if a concern involves your supervisor it may not be comfortable or appropriate to discuss the concerns directly. It is always an appropriate alternative to contact the hospital's compliance officer to discuss your concerns. You may reach the hospital compliance officer **at extension 566**. Discussions with the compliance officer will be treated as confidential, and your identity will be protected to the extent allowed by law.
- **Call the compliance hotline.** You can also use the hospital's compliance hotline to report your concern. The compliance hotline can be called toll free from anywhere in the United States at **866-485-2521**. Reports to the hotline can be made anonymously and/or

confidentially, and anonymity and/or confidentiality will be protected to the extent that the law allows.

HOSPITAL'S POLICY AGAINST RETALIATION

The hospital's policies prohibit retaliation against anyone who in good faith reports a concern about possible or actual non-compliance. Every report of retaliation by hospital workforce members will be promptly investigated and if the investigation results in a finding that retaliation did occur, will result in discipline up to and including termination of the retaliating individual's employment or other relationship with the hospital.

FEDERAL AND WASHINGTON STATE FALSE CLAIMS LAWS

A Federal law known as the False Claims Act (FCA) prohibits knowing submission of false or fraudulent claims for reimbursement by any Federal government program, including Federally funded healthcare programs like Medicare and Medicaid. A person or organization can “knowingly” submit a false claim by (1) having actual knowledge that the claim is false, (2) ignoring information that suggests that a claim is not accurate, or (3) acting recklessly or not taking due care to assure that a claim is accurate and appropriate.

The False Claims Act provides for significant fines and penalties when it is violated. Treble damages, or three times the amount of any improper payments that result, can be assessed. In addition, a fine of between \$5,500 and \$11,000 can be imposed for every false or fraudulent claim. The government also has authority to require Medicare providers to enter into Corporate Integrity Agreements or to exclude providers from participation in Federal health care programs. In severe cases criminal prosecution is also possible. These severe results—combined with the Hospital’s desire to operate an ethical business environment—are among the reasons that we have a compliance program, have adopted this Code of Conduct, and require every work force member to report concerns about possible violations so that we can find and resolve problems early.

Washington’s State laws provide similar penalties for filing false or fraudulent claims. The Medical Care Public Assistance Statute requires repayment of improper payments with interest, and provides for treble damages and criminal fines of \$25,000 for every false or fraudulent claim that is willfully filed with the Washington State Public Assistance Program (RCW 74.09). Washington’s Health Care False Claims Act (RCW 48.80) makes it a felony to knowingly present a false or fraudulent claim to any government or private health care payor.

In addition to the protections provided by [hospital’s] policy that prohibits retaliation for good faith reports about compliance concerns, both Federal and Washington State law provide protections against retaliation for individuals who report fraud in good faith to the government. The Federal False Claims Act also allows an individual (a “relator”) to file a civil law suit on behalf of the government to recover amount paid because of False Claims, and to share in any recovery that is made for the government as a result of the law suit.

CONCLUSION

This Code of Conduct is a tool designed to communicate standards that apply to patient care and business activities at the hospital. The Code is intended to assure that every hospital workforce member understands the standards and can help the hospital meet its obligation to comply. It is intended to help create and support a culture where,

when problems do arise, they are identified quickly and resolved. Every hospital workforce member has an important role to play.

If you have questions about the Code of Conduct and what it requires, please talk to your supervisor or to the compliance officer. If we work together, we can make Willapa Harbor Hospital a patient care environment and workplace of which we can all be proud.