

STANDARDS OF CONDUCT

St. Joseph's Hospital of Buckhannon, Inc.

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MESSAGE FROM THE CEO

Dear Employee, Board or Member of the Medical Staff,

The *Standards of Conduct* for St. Joseph's Hospital was adopted in connection with its overall corporate integrity program, with the intent of providing each employee an understanding of what is expected from all of us in the work environment. These Standards represent an organizational commitment to provide quality care and conduct all business with integrity and in compliance with federal and state laws and regulations.

Therefore, we are all expected to follow these standards and use them to guide our conduct when working for and representing St. Joseph's Hospital. Although these standards do not cover every possible situation, they do provide broad guidelines, which are reinforced in greater detail by other policies and procedures.

St. Joseph's maintains an open communication policy for employees. Accordingly, if you have a question or concern, it should be raised with your immediate supervisor, human resources representative, or any other member of the senior management team. If these avenues do not resolve your problem or concern, or if you wish to remain anonymous, St. Joseph's has an employee "Hotline" 1-877-888-4783. Callers are assured anonymity or confidentiality to the limit of the law.

If you are aware of violations of the *Standards of Conduct*, policies or procedures, law or regulations, you have an obligation to report them. St. Joseph's prohibits any form of retaliation or retribution against individuals for reporting problems in good faith through the regular channels of communication or to the Hotline.

Consistent with the Values of St. Joseph's Hospital and on behalf of the Board and Administration, I commit to support the principles set forth in the *Standards of Conduct* and the corporate integrity program. The continued success of St. Joseph's Hospital and its commitment to the community depends upon maintaining and upholding the *Standards of Conduct*, and its applicable rules, regulations, and standards governing appropriate delivery of high quality healthcare services.

Sincerely,

Sue E. Johnson-Phillippe, FACHE
President and Chief Executive Officer

MISSION

St. Joseph's tradition of caring and nurturing the sick began on March 29, 1921, when four Pallotine Missionary Sisters opened an 8-bed hospital, which they dedicated to St. Joseph. Inspired by the motto of their founder, St. Vincent Pallotti, "The love of Christ impels us," our pioneer Sisters created a strong foundation by their dedication and hard work.

Hundreds of lay people have joined the Sisters to bring quality health care to the people of Buckhannon and the surrounding area. All of us at St. Joseph's – employees, physicians, trustees, volunteers – share in the Sisters' mission to extend the healing presence of Jesus Christ. We face the future with the same determination and faith as our founding Sisters.

Like Jesus, we minister to the whole person and believe that adequate health care is a basic right of all people. We believe that human life is sacred and that all persons have a profound dignity because all are created by God in His image. This philosophy is reflected in our Mission Statement.

*We are inspired by the love of Christ
To provide our community with quality health care
In ways which respect the God-given dignity of each person
And the sacredness of human life.*

VALUES

Values are the guiding principles of our actions. They reflect our beliefs and our aspirations, and provide stability in a time of change. At St. Joseph's a strong belief in our core values is interwoven into the fabric of our culture. These values reflect what we stand for, what we expect from ourselves and each other, and what we aspire to be.

Because the love of Christ is the motivating force for all we do, we have arranged our core values to His name. Each of us at St. Joseph's is committed to these values and to making them present in our relationships with those we are privileged to serve, and with each other. Our values will guide us as we continue our tradition of excellence and dedication to health all we touch.

Compassion

Showing loving concern and understanding for the whole person.

Compassion means to feel with; therefore, we try to put ourselves in the place of others and be present to them in their suffering and need. We wish to allow God's compassion to become alive in our words and actions. We strive to reach out to others, touch their lives, and gently communicate love through generous service.

Hospitality

A warm, helpful and welcoming attitude toward all persons.

We want everyone coming to St. Joseph's to feel at home – welcome, comfortable, cared for and about, and secure. Hospitality calls us to be courteous, welcoming and attentive to the needs of others.

Reverence

Respect for the God-given dignity of each person.

We believe that all persons are created by God in His image. Human life is, therefore, of extraordinary value and sacred at every moment and stage of development. Reverence calls us to treat every person with respect and dignity, and to care for everyone, irrespective of race, creed, age, and socioeconomic status. We wish to care for people so that they become whole and grow into the persons God wants them to be.

Interdependence

Cooperation and collaboration among all member of our health care community.

The members of all our departments, as well as trustees and volunteers strive to work together as a team to make high quality health care a reality.

We are committed to maintaining close working relationships and collaboration with physicians, various community agencies and health care providers to meet our community's health care needs.

Stewardship

Responsible use of and accountability for our human, material and financial resources.

Resources in health care belong to the Creator. We heal because God heals; have skills because God has created us with the wonderful capacities for learning and inventing.

We strive to be good stewards of the gifts and resources entrusted to us and use them to create a healthy community and, within our means, to respond to the needs of the poor through service and advocacy.

Trust

Integrity, truthfulness and straightforwardness in relationships.

St. Joseph's is a place of trust where all who enter find physical, psychological and spiritual security.

We strive to respect others' right to privacy, promote confidentiality at all levels and to communicate clearly and accurately what can be expected of us and what we expect of others.

We are committed to reflecting faithfulness to our mission, values and policies in the way we perform our healing ministry.

QUALITY OF CARE

St. Joseph's first responsibility is to our patients, their families and the communities we serve. We will provide high quality care and services.

- We will anticipate and respond to all patient needs.
- We will encourage open and honest communication with the patients recognizing their right to informed consent and the right to refuse treatment.
- We will respect the human dignity of each patient by sensitively responding to all patient questions, concerns and needs in a timely manner.
- We will ensure that admissions, transfers, and discharges are medically appropriate. Admission, transfer and discharge decisions will not be based on the patient's ability or inability to pay.
- We will ensure that only patients whose specific condition or disease cannot be appropriately treated at the hospital or patients who request transfer are to be referred to another facility.
- We will employ only properly licensed and credentialed providers with proper expertise and experience to care for our patients.
- We will not discriminate against anyone for any reason including race, color, creed, national origin, religion, gender, disability, age, or ability to pay.

COMPLIANCE WITH LAWS AND REGULATIONS

St. Joseph's will conduct its business and patient care operations in accordance with all applicable laws, regulations and professional standards in order to maintain the integrity of our organization.

- Confidential patient information will be available only to those providing direct care, or others authorized to review patient information.
- We will not provide or participate in kickbacks, bribes, rebates or anything else of value in order to influence the referrals of patients.
- We will ensure that all agreements with individuals or organizations that may be a possible referral source are in writing and approved by appropriate management or legal counsel.
- We will maintain complete and accurate patient medical records and keep all such information confidential.
- We will compete in the market solely on the merit of our services. Marketing practices must be conducted with truth, accuracy and responsibility to patients and the community.

BILLING AND CODING

St. Joseph's will maintain a commitment to fair and accurate billing that is in accordance with all federal and state laws and regulations.

- We will bill only for services that are medically necessary, actually provided and documented in the patient's medical records.
- We will not knowingly submit for payment or reimbursement a claim that is false, fraudulent or fictitious.
- We will make every reasonable effort to assign billing codes that accurately reflect the services and products that were provided. Up coding, unbundling or any other means of artificially enhancing reimbursement is unlawful and strictly prohibited.
- We will regularly review our records for credit balances and promptly refund any overpayments.
- We will not routinely waive insurance co-payments or deductibles.
- We will conduct general collection/credit procedures according to the Fair Debt Collection Practices Act.

PROTECTION OF PROPERTY

St. Joseph's is committed to protecting its property, and the property entrusted to us, against, loss, theft or misuse. Property includes physical assets, funds and proprietary information.

- We will correctly use and care for all property and equipment entrusted to us.
- We will respect and safeguard the property of employees, patients and their visitors.
- We will protect confidential patient and hospital information and not use or reveal such information except in the proper performance of duties.
- We will maintain, inventory and keep all supplies secure.
- We will dispose of all surplus or obsolete property and equipment according to established procedures.
- We will not permit making unauthorized copies of computer software or using unauthorized personal software on computer equipment. We will not allow the use of computer software or hospital computer equipment unless approved by Management Information Systems and the use is job related.
- We will not communicate or transfer any information or documents to any unauthorized persons.
- We will store all records in a secure location for a period of time required by law. The premature destruction or alteration of any document in response to, or in anticipation of, a request for those documents by any government agency or court is strictly prohibited.

CONFLICTS OF INTEREST

St. Joseph's employees are expected to refrain from and avoid conflicts or even the appearance of conflicts between their private interests and those of St. Joseph's Hospital.

- We will not pursue any activity that might conflict, or appear to conflict, with the interests of the organization. A conflict exists whenever an employee or a related party (e.g. family member, friend, or business associate) may receive a benefit from any decision or action taken by the employee.
- We will exercise good faith and fair dealing in all transactions that involve our responsibilities to the organization.
- We will not misuse our position for personal gain.
- St. Joseph's does not object to employees holding other jobs as long as they can effectively meet the performance standards for their job at St. Joseph's and no conflict is caused by the arrangement.
- We will disclose any potential conflicts of interest to management or administration.
- We will not accept or provide any gifts with a value in excess of \$100 without the approval of the CEO. Certain charitable donations exceeding this value or gifts to individuals in appreciation for their volunteer service to St. Joseph's may be provided upon approval of the CEO. However, no gift will ever be made in order to influence the referral of patients or services.

HEALTH AND SAFETY

St. Joseph's Hospital is committed to maintaining a workplace that protects the health and safety of our patients and employee partners.

- We will comply with all safety and health requirements whether established by management, federal, state or local laws, or accrediting organizations.
- We will take all reasonable precautions and follow all safety rules and regulations to maintain a safe environment for our patients, employees, physicians, visitors, and vendors.
- We will provide an environment that is free from violence. Unauthorized weapons of any kind are prohibited at St. Joseph's Hospital or on its property.
- We request that staff be aware of their surroundings and report any suspicious person or activity to the supervisor and/or the Security Department.
- The unlawful manufacture, distribution, dispensing, use, purchase, sale, possession or consumption of alcohol or drugs, or reporting to work in an intoxicated condition, is strictly prohibited. Any violation is grounds for disciplinary action, up to and including termination. Taking over-the-counter and physician prescribed medication according to direction is acceptable provided such medication does not impede his/her ability to perform normal duties and there is no impact on the employees' capability to fulfill their job functions.
- We will safely store, secure and count all drugs and pharmaceuticals. Missing drugs will be promptly reported to supervisors.
- We will follow all rules and regulations regarding the disposal of medical waste or hazardous material. Promptly report to a supervisor all spills or accidents involving medical waste or hazardous materials and take action immediately to help prevent harm.
- We will promptly report to a supervisor, and complete a report in the online occurrence reporting system, any accidents involving injury to a patient, employee, staff member or visitor.
- We will provide training in safe work practices to reduce hazards to the health and safety of employee partners and others. We will have supervisors be responsible for inspecting the work area under their control for health and safety risks, eliminating or reporting risks, be familiar with health and safety procedures, and train their employee partners in health and safety precautions.
- In our continuing commitment to an environment of healing and good health, all hospital properties are tobacco-free. As leaders in healthcare, we have an obligation to assert strongly the demonstrable risks of tobacco use.
- As part of our overall commitment to maintain a healthy and safe environment for our patients, employees and others, we strive to keep our facilities physically secure. We are issued photo ID badges that must be worn above the waist at all times. It is your responsibility to keep your badge in your possession and not let any other person borrow it.

BEHAVIORS THAT UNDERMINE A CULTURE OF SAFETY

Definition of behaviors that undermine a culture of safety: All members of the health care provider team including, but not limited to, employees, physicians and allied health professionals, contract personnel and vendors, and all direct and indirect recipients of health care including, but not limited to, patients, their families, and visitors, shall be treated in a respectful, dignified manner at all times. St. Joseph's Hospital will not tolerate disruptive and inappropriate behaviors in its environment.

Acceptable Behavior:

The Standards of Conduct provide a broad guideline of acceptable behaviors. Employees are expected to follow these standards and use them to guide their conduct when working for and representing St. Joseph's Hospital.

Disruptive and inappropriate behaviors include, but are not limited to:

- Threatening or abusive language directed at patients, visitors, vendors, hospital staff, other members of the healthcare team, or other persons (e.g. belittling, berating, and/or threatening another individual).
- Fighting, scuffling, other aggressive physical behavior, and/or any other disorderly conduct
- Unnecessary shouting or demonstrations, verbal outbursts, using obscene, abusive, insulting, or offensive language including, but not limited to, racial, religious or sexual slurs, or any other type of inappropriate language.
- Degrading, insulting, or demeaning comments.
- Profanity or similarly offensive language.
- Inappropriate physical contact with another individual that is threatening, unwelcomed or intimidating.
- Refusal to perform assigned tasks, having an uncooperative attitude, condescending language or voice intonation, impatience with questions (giving the appearance or impression of being bothered) and improper responses, to include but not limited to, intentionally failing to return phone calls or pages.
- Immoral or indecent conduct on hospital premises or when using hospital property.
- Any form of horseplay, running, or throwing of objects which could jeopardize patient care, create a risk of injury or property damage, or reflect poorly upon the hospital.
- Any other conduct not meeting St. Joseph's Hospital Standards of Conduct

HUMAN RESOURCES

St. Joseph's is committed to providing opportunities for development to all employees.

- We will provide a work environment for all employees free from harassment and intimidation. Harassment is defined as physical or verbal conduct that offends or is hostile toward an employee.
- We will not discriminate against any employee on the basis of race, color, creed, national origin, religion, gender, disability, or age.
- We will endeavor to maintain open lines of communication so that the views of each employee may be considered and their opinions given proper respect and consideration.
- We will continually strive to build confidence and professionalism in every employee.
- We will encourage each employee to continually evaluate existing methods of delivering services in order to discover more effective ways of allocating the resources for patient care and support services.
- We will always show respect and consideration for one another, regardless of status or position.

COMPLIANCE OFFICER

St. Joseph's has appointed a Corporate Integrity Officer (CIO) who is responsible for the daily oversight of the integrity program. Some of the CIO's responsibilities include:

- Establishing and maintaining the Standards of Conduct;
- Overseeing the operation of the employee hotline;
- Establishing auditing and monitoring mechanisms to ensure compliance; and,
- Receiving, investigating, and resolving problems, concerns, questions and issues raised by employees related to the integrity program, including potential violations of the Standards of Conduct, policies and procedures, laws and regulations;

COMPLIANCE PROGRAM

The St. Joseph's Hospital Board of Directors has adopted a policy of corporate compliance and responsibility and will require its directors, officers, employees, agents and contractors, including medical staff members and allied health professionals to comply with the Corporate Compliance Program.

EMPLOYEE RESPONSIBILITY

Everyone is expected to follow the Standards of Conduct; St. Joseph's policies and procedures, as well as laws and regulations. Anyone with knowledge of a violation of the Standards of Conduct, St. Joseph's policies and procedures, laws or regulations must report this information. Failure to report a known violation may subject employees to disciplinary action even if he/she were not involved. All employees are expected to participate in educational programs concerning the Standards of Conduct and laws, rules, regulations and policies applicable to their job performance. As part of its Compliance Program, St. Joseph's shall not knowingly employ, with or without pay, any individual or entity listed by a federal agency as debarred, suspended or otherwise ineligible for participation in any federal programs and will remove any debarred, suspended or otherwise ineligible individuals or entities from any Medicare or Medicaid billing function. Nothing contained in the Standards of Conduct is to be construed or interpreted to create a contract of employment, either express or implied, nor is anything contained in the Standards of Conduct intended to alter a person's relationship with St. Joseph's Hospital from that of "employment-at-will" to any other status. While St. Joseph's Hospital will generally attempt to communicate changes concurrent with or prior to the implementation of such changes, St. Joseph's Hospital reserves the right to amend the Standards of Conduct, in whole or in part, and any time and solely at its discretion.

NON-RETALIATION POLICY

No disciplinary action or other form of retaliation or revenge shall be taken against any employee who reports an issue, problem, concern or violation to management, human resources, the CCO or the employee hotline in good faith. Reporting does not protect individuals from appropriate disciplinary action regarding their own performance or conduct, including malicious reporting intended to harm St. Joseph's or other employees. However, self-disclosure will be viewed favorably and may reduce potential disciplinary actions.

EMPLOYEE HOTLINE

St. Joseph's Hospital recognizes that there are times when concerns cannot be properly addressed through the normal chain-of-command. St. Joseph's Hospital established a toll-free number and hotline operation for this purpose. When such situations develop, employees are encouraged to call the hotline staffed by National Hotline Services, Inc. at 1-877-888-4783.

Calls to the hotline will not be traced or recorded. All callers to the hotline may remain anonymous. If callers choose to identify themselves, their confidentiality will be protected to the extent permitted by law.

No action of retaliation will be taken against anyone for calling the hotline to make a report, complaint or inquiry in good faith. However, calls to the hotline do not protect callers from appropriate disciplinary action regarding their own performance or conduct, including malicious calls intended to harm St. Joseph's or other employees.

The Integrity Officer will evaluate and respond to allegations of wrongdoing, concerns and/or inquiries made to the hotline in an impartial manner. The Integrity Officer will respect and protect the rights of all personnel, including anyone who is the subject of a hotline complaint. All allegations will be thoroughly investigated and verified before any action is taken. Furthermore, any disciplinary action or other response resulting from a call will be held confidential by the hotline staff. If you feel uncomfortable reporting via the hotline, you may directly contact the St. Joseph's Hospital Integrity Officer at 304-473-2108.