

Cordova Community Medical Center

At CCMC, we do the right thing...even when no one is watching

Mission

Deliver quality health care locally.

Core Values

Honesty

Integrity

High Ethical Standards

Respect

Cordova Community Medical Center (CCMC) is dedicated to the highest level of professional and ethical standards in its service to the community. Staff and Administration work in partnership with one another, visiting specialists and their staffs, and other community providers, based on respect and the highest professional standards. Employees comply with all applicable federal and state laws and regulations in the course of carrying out CCMC's mission, act honestly and with integrity at all times, and provide the best possible care to all patients in a friendly, helpful, and courteous manner.

Why Do We Have a Code of Conduct?

Each day in our work, we make choices about how to conduct ourselves. Each of us is accountable for those decisions. The Code of Conduct is an important part of CCMC's Compliance Program. It does not replace any policy or procedure, but rather, is a resource for you – helping you understand specific laws you are required to obey, CCMC's Compliance Program, and your responsibilities. The Code reflects our commitment to respect, honesty, and integrity. The Code of Conduct is also a way for us to communicate our commitment to ethical conduct to the Cordova community.

The CCMC Compliance Program

CCMC created the Compliance Program to make sure that we are conducting our business legally and that we do our very best to eliminate any instances of fraud, waste, or abuse. The Compliance Program includes several pieces that help us meet this goal:

- The Code of Conduct and Policies and Procedures related to compliance; and
- A Compliance Coordinator, who makes sure we comply with all the laws, makes sure you understand your role, and is your contact point for questions or concerns; and
- Training to help you understand the compliance program and your responsibilities.

Why Is the Code of Conduct Important to Me?

Compliance is everyone's responsibility and the Code of Conduct helps you:

- make sure you are following the law and CCMC's standards;
- decide if your behavior would harm CCMC's reputation;
- contact the right person if you think a violation has occurred; and
- know what to do if retaliation occurs.

What Do I Have to Do?

1. Follow the CCMC Code of Conduct.
2. Perform your job duties honestly, respectfully, and with integrity.
3. Report any suspected or actual violations.
4. Keep information about CCMC, our patients, residents, and one another confidential.
5. If you have questions, ask your supervisor, a Manager, or the Compliance Coordinator.

How Do I Report a Suspected Violation?

If you suspect a violation of the Code of Conduct or applicable law or regulation, talk to your supervisor or another Manager. If you are uncomfortable discussing your concerns with a supervisor or feel those concerns are being ignored, contact the Compliance Coordinator. You do not have to leave your name, although you may if you wish. Every report is investigated, and CCMC will correct any substantiated violations and take steps to prevent recurrences.

No employee will face disciplinary action for reporting a compliance matter in good faith, nor does CCMC allow retaliation or harassment of an employee who has made a report. If you feel that you are facing retribution, you should immediately notify your supervisor, another Manager, or the Compliance Coordinator.

There are three ways to report concerns anonymously and confidentially:

1. call the Compliance Hotline: 424-7434;
2. drop a written statement in the Compliance Drop-box near the nurses' station; or
3. use the internet.

What Will Happen to Me if I Violate a Law, Regulation, or the Code of Conduct?

Compliance is everyone's job. If you:

1. fail to obey the law or follow the Code of Conduct;
 2. take an action that directly or indirectly leads to a violation of law;
 3. fail to report a suspected or actual violation; and/or
 4. participate in direct or indirect retaliation against an employee who reports a violation;
- you will be subject to disciplinary action. Penalties include termination, suspension, demotion, reprimand, fines, and/or retraining. CCMC disciplines employees who intentionally violate a component of the Compliance Program more severely than one who does so by accident.

Code of Conduct

Patient Standards

CCMC maintains the highest quality health services through an active Quality Management and Quality Improvement program.

Quality of Care

CCMC provides quality healthcare that is both timely and effective. Medically necessary health care services are available to all individuals, regardless of their ability to pay. CCMC assists persons with financial needs by waiving all or part of the charges for services provided based on Board-approved guidelines. CCMC provides covered designated health services or necessary care to members of a health maintenance organization with which CCMC has a contract.

Confidentiality

CCMC keeps all patient information (including medical records) strictly confidential and does not release information to anyone other than the provider without written patient consent or lawful court order. Employees may only access medical records when there is a legitimate, work-related need. Employees may not discuss confidential information in social conversations or where others, including family, can overhear.

- Always ask yourself, “Do I need to know this information as part of my job?”
- Use or view the minimum information necessary to complete your task.
- Don’t leave patient information showing on your computer screen or desk.
- Don’t hold patient-related discussions in public areas; always be aware of who might be in the area.
- Follow all guidelines for transmitting or sharing protected health information.

EMTALA Screening and Patient Transfers

CCMC medically screens patients to determine if the patient has an emergency medical condition. CCMC will not transfer a patient who needs emergency treatment (including psychiatric) if the patient is not stable, nor will CCMC refuse or delay emergency treatment on the basis of the patient's insurance or ability to pay.

Patient and Resident Rights

CCMC patients have the right to voice their grievances concerning their treatment, care, management of funds, lost clothing, violation of rights, or any other concern. Upon admission, each resident or responsible party receives a copy of the federal list of Resident Rights and a copy of the addresses and telephone numbers of agencies and persons, which they may contact to file a complaint. Generally, the Director of Nursing or the

Administrator will actively seek a resolution and keep the resident (and their legal guardian) informed of progress toward resolution. Patients and residents will not be discriminated against or receive retaliation because of their voiced grievance.

How You Behave Matters!

Everything we do affects CCMC's reputation, and it is important that every member of the CCMC team communicate honestly and openly, treat one another respectfully, and act with utmost integrity.

Conflict of Interest

CCMC Employees should avoid outside employment or activities that could have a negative impact on their job performance, conflict with their obligation to CCMC, or negatively impact CCMC's reputation in the community. Employees may not use CCMC assets (equipment, supplies, funds, records and data) for personal reasons.

Payroll and Reimbursement

Employees are honor-bound to submit accurate time sheets and expense reports.

Political Activity and Contributions

Personal political activity must not reference CCMC or the employee's position at CCMC. Employees may not use CCMC's electronic mail service to communicate personal opinions to other individuals, elected representatives, government agencies, newspapers, periodicals, or other external organizations to prevent personal opinions being construed as official CCMC policy.

Obey the Law

Obeying the law is the personal responsibility of every member of the CCMC team and a cornerstone of CCMC's Compliance Program.

Licensing & Certification

CCMC verifies the qualifications of health care providers who treat our patients, ensuring that they meet the applicable Federal and State credentialing requirements. CCMC will not knowingly employ any individual who has been convicted of a criminal offense related to health care or who is ineligible to participate in federally funded health care programs.

Billing (False Claims Act)

CCMC will not submit false claims for payment. Submitting a false claim might be using the wrong billing codes, falsifying the medical record, or billing for services that are not

provided or not medically necessary. CCMC verifies patient information and bills accurately and only for medically necessary services that are provided and documented.

Falsification of Records

Federal law requires CCMC to ensure that its books and records accurately reflect the true nature of the transactions represented. CCMC's prepares accurate and complete financial reports and claims for payment. Permanent entries in CCMC records should never be altered. Slush funds or similar off-book accounts, where there is no accounting for receipts or expenditures on corporate books, are strictly prohibited.

Referrals

CCMC accepts patient referrals and admissions solely on the patient's medical needs and CCMC's ability to provide the needed services. CCMC does not accept payment for the referrals we make, nor do we consider the number or referrals or revenue generated to CCMC by another provider. Beyond a contractual relationship, employees or family members may not gain personally from the purchase or sale of CCMC services.

Gifts or Gratuities

CCMC employees must to refrain from accepting items or favors that may create a conflict of interest, be construed as a bribe or be interpreted as affecting an employee's impartiality. Examples include:

- Individual receipt of flowers, candy or other items from patients, residents or vendors
- Unapproved receipt of resident funds
- Unapproved receipt of CCMC items such as airline miles, companion tickets and supplies
- Unauthorized personal use of hospital property, including vehicles and credit cards
- Unauthorized personal use of corporate and other hospital accounts

If an employee receives or is offered a gift or gratuity, such an action must be reported to the employee's immediate supervisor. Acceptance of such items without the approval from administration may result in disciplinary action up to dismissal from employment.

Antitrust (Fair Competition)

CCMC employees may not engage in any activity which limits fair competition, such as price sharing with other facilities, bid rigging, boycotting, bribery, deception, or intimidation.

Cooperation with Law Enforcement and Government Investigations

CCMC is committed to cooperating with enforcement investigations and activities within the bounds permitted by law, and any person who elects to speak with a law enforcement officer should tell the complete truth. Anyone who is contacted by an enforcement or government official should:

1. Note the individual's name, title, and agency. Obtain a telephone number.
2. Contact your supervisor and the Compliance Coordinator.

Individuals presented with a subpoena, warrant, or court order have the right to an attorney when speaking with the law enforcement or government official. Employees should never provide reports or other records - the Compliance Coordinator will manage the disclosure of requested documentation.

Records Retention

The government requires that CCMC keep certain records for specific periods of time. Relevant records must not be destroyed whenever litigation or a government investigation or audit is pending. Until the matter is closed, destroying records to avoid disclosure in a legal proceeding may constitute a criminal offense.

Respect One Another

Each one of us is a vital component of the CCMC team and it is important that we work together cooperatively.

Protecting Employee Information

CCMC safeguards employees' personal information and restricts access to the employee and those with a legitimate business or legal need.

Equal Opportunity

CCMC is committed to providing equal employment opportunity to qualified individuals, regardless of their race, color, sex, age, national origin, or other protected status. This commitment relies on all employees treating each other with mutual respect, courtesy and fairness. Every employee has a right to work in an environment free of harassment or discrimination because of race, color, sex, religion, national origin, disability or age.

Safety, Health and Environment

CCMC is committed to providing a safe and healthy workplace for its employees and for visitors to its premises. Employees have a responsibility to abide by safe equipment operating procedures and guard their own and their fellow employees' health. Employees are encouraged to report any conditions that they perceive to be unsafe, unhealthy or hazardous to the environment.