Ohio Valley Health Services & Education Corporation

Code of Conduct

Ohio Valley Medical Center
East Ohio Regional Hospital

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Code of Conduct Resolutions
Adopted by Resolution by the Ohio Valley Medical Center Medical-Dental Staff on September 1, 2011.

Adopted by Resolution by the East Ohio Regional Hospital Medical-Dental Staff on September 6, 2011.

Adopted by Resolution by the Ohio Valley Health Services & Education Corporation Board of Trustees on September 21, 2011.
Message from the Board of Trustees

Dear OVHS&E Administration, Employees, Medical Staff and others,

As a representative of the Upper Ohio Valley Community for whom you provide a vital service, I would like to thank you on behalf of the Board of Trustees.

We are proud to be associated with a group of people with the capability of supporting the tradition of service you provide as well as the integrity to uphold the core values, principles and standards upon which these institutions were built. As our organization continues to evolve, it is imperative that we conduct our business under strict ethical and legal guidelines and this Code of Conduct will help to outline these for you. The Code of Conduct also profiles various methods for reporting any actions or conduct that you may feel does not meet our standards. We vow to protect all persons against any retribution or retaliation when complying with our Code of Conduct.

The Board of Trustees is determined to do its part by being diligent in monitoring the business, financial, ethical and legal aspects of operating a hospital while relying on you to apply the same diligence to the quality and ethical care of the community we serve.

Please review the Code of Conduct and understand the information contained within its pages. Keep in mind that we all must constantly strive every day to maintain the integrity of its meaning and our actions.

Our institutions were founded on the need to provide services based on the caring nature, expertise and valuable knowledge of our staff. We have a rich heritage, steeped in the tradition of excellence and are asking all those associated with our organization to protect and support the values and principles that we established.

Sincerely,

Matthew C. Thomas
Chairman, OVHS&E Board of Trustees
INTRODUCTION TO THE CODE OF CONDUCT

Ohio Valley Health Services & Education Corporation (OVHS&E) has adopted a Compliance Plan to assist all employees and organizational representatives to carry out our daily activities to provide quality, compassionate, and state-of-the-art family centered health care to our community within the boundaries of appropriate ethical, legal, and regulatory standards. The OVHS&E Code of Conduct serves as the cornerstone of our compliance commitment.

What is the OVHS&E Code of Conduct?

The OVHS&E Code of Conduct is a document that describes our organization’s principles, values, and standards for behavior. The Code outlines the basic rules that OVHS&E employees and other organizational representatives are expected to follow in order to provide quality health care services within appropriate ethical, legal and regulatory standards.

The Code of Conduct helps us to achieve our mission the right way
Why do we need a Code of Conduct?
The Code of Conduct helps all OVHS&E employees and representatives understand the organization’s values and how these values impact our daily decisions, actions, and behaviors at work. The Code of Conduct is not a stand-alone document but serves as a general guide of the type of behavior that is expected of each employee and organizational representative.

OVHS&E Mission Statement
To provide quality, compassionate and state-of-the-art family centered health care, while promoting education and wellness

Who does the OVHS&E Code of Conduct apply to?
The OVHS&E Code of Conduct applies to all OVHS&E employees, senior management, the organization’s Boards of Trustees, the organization’s medical staff, and all representatives including independent contractors when they are acting on behalf of OVHS&E.

The Code of Conduct applies to all employees, senior management, the Board of Trustees, the Medical Staff, and all OVHS&E representatives
OVHS&E CODE OF CONDUCT

Quality of Care
We are committed to providing quality, compassionate, and state-of-the-art family centered health care to our community. In order to promote high-quality care, the organization has a performance improvement program, a process for credentialing and privileging members of the medical staff, and peer review processes within the medical staff.

All safety and quality concerns must be reported

It is the responsibility of all employees and members of the medical staff to follow recognized quality standards. If for any reason any member of OVHS&E has a safety or quality concern, that person is required to bring this concern to the appropriate person so it may be addressed and resolved. **Safety or quality issues may be reported to your department manager, the Director of Safety, the Director of Performance Improvement, or any member of senior management.** If necessary, the Joint Commission may be contacted directly to report quality or safety issues.

Customer service is an essential part of quality patient care. All employees are expected to treat patients in a caring and compassionate manner. Our goal is for all of our patients to always be satisfied with the services provided.
**Patient Rights**

We are committed to treating all our patients with courtesy, dignity, and respect. Upon admission, all patients are given a written statement of patient rights. Patient rights include the right to receive a clear explanation of the care they receive including available treatment options, the right to refuse or accept care, the right to choose where they want to receive post-discharge care, and the right to choose their own visitors.

*We will never make decisions about the health care of our patients based upon discriminatory reasons such as race, color, national origin, religion, sex, gender identity, sexual orientation or disability*

Patients need to be informed about the care they receive and have the opportunity to participate in decisions regarding their care. We are committed to the fair and objective resolution of any conflicts that occur regarding a patient’s care including referral to the appropriate Ethics Committee as needed. We will never make decisions about the health care of our patients based upon discriminatory reasons such as race, color, national origin, religion, sex, gender identity, sexual orientation or disability.
Patient Privacy

We are committed to protecting the privacy of our patients. Our employees must never use or disclose confidential information that violates the privacy rights of our patients. All privacy standards as required by HIPAA and outlined in the HIPAA policy manual must be followed by all system employees and representatives.

No employee or representative may access any patient information other than that which is necessary to perform his or her job. No employee or representative may disclose patient information other than that which is necessary to perform his or her job.

Employees are not allowed to access patient information unless that information is needed to do their job.

Inappropriate access or inappropriate disclosure of patient information is subject to disciplinary action up to and including termination. Any information regarding a privacy violation, whether accidental or intentional, must be reported to the privacy officer directly or through the privacy hotline at 8581.

Privacy Hotline
8581
Emergency Treatment

We are committed to providing necessary emergency medical treatment regardless of the patient’s ability to pay. **OVHS&E follows the requirements of the Emergency Medical Treatment and Active Labor Act (EMTALA) in providing an emergency medical screening and examination and necessary stabilization to all patients.** We will not delay treatment in order to seek financial or demographic information. We do not admit, discharge, or transfer patients with emergency medical conditions based upon the patient’s ability or inability to pay. Patients with emergency medical conditions are only transferred to another facility at the patient’s request or if the patient’s needs cannot be met at our facility.
Interactions with Physicians & Other Referral Sources

We are committed to compliance with the Federal laws and regulations that govern the relationships between the organization and physicians or other referral sources. Care must be taken that any relationships with physicians or other referral sources do not violate the Anti-Kickback Law or the Stark Law.

It is a violation of Federal law to pay for patient referrals or to accept payment for the referral of patients. Payment includes anything of value that is offered or received in exchange for patient referrals. This includes the provision of free supplies or equipment, free or discounted office space, or free use of hospital employees.

It is a crime to pay for patient referrals

Any arrangement with a physician or other referral source must comply with all legal requirements. Arrangements with physicians must be in writing and approved by the Compliance Department and Legal Counsel. Failure to meet all legal requirements can result in serious consequences for the organization. Employees that become aware of suspect arrangements with physicians or other referral sources are required to report such arrangements to the Compliance Department.

No OVHS&E employee or representative is permitted to offer or receive anything of value in exchange for patient referrals
Legal & Regulatory Compliance

Our organization provides a variety of health care services in Ohio and West Virginia. All health care services we provide are subject to various Federal and State laws and regulations and the conditions of participation for Federal health care programs. We are committed to fully comply with these rules.

The organization has developed many policies and procedures to address these legal and regulatory requirements. However, it is impractical to develop policies and procedures to address every law, regulation, standard, and condition of participation. In the absence of a specific policy, our employees and representatives are still expected to follow the law.

Compliance Hotline
8181
Toll free: 1-877-249-3280

Employees are required to report any violations or suspected violations of laws, regulations, standards, and conditions of participation to the appropriate individual. Compliance concerns should be reported to the Compliance Officer directly, through the Intranet Compliance Hotline, or through the Compliance Hotline at 8181 (Toll free: 1-877-249-3280).
**Accreditation and Surveys**

We will interact with all accreditation and external survey organizations in a direct, open, and honest manner. We must never intentionally mislead an accrediting organization or survey team. In preparation for or during a survey or inspection, we must never conceal, destroy, or alter any documents; lie; or make misleading statements to an agency representative.

**Employees are expected to be honest with all auditors and surveyors**

**Business and Financial Information**

Our employees and representatives are required to maintain the accuracy and integrity of the organization’s documents. **It is important to remember that a patient’s medical record is a legal document.** No one is permitted to alter or falsify information on any record or document including the organization’s business and financial documents. Medical and business documents must never be destroyed in response to a government investigation. All documents should be handled in accordance with the appropriate policy.
Coding and Billing

We are committed to bill appropriately for the services we provide. OVHS&E employees and representatives are prohibited from any practice that could result in the submission of a false claim for payment to the government or other payor. Prohibited practices include, but are not limited to, billing for services not provided, falsifying a diagnosis in order to get paid, duplicate billing, and using a code that does not accurately represent the service that was provided.

It is wrong to bill for services not provided, use a false diagnosis to get paid, or use a code that does not accurately represent the service provided

All employees are required to report any questionable billing practices to the appropriate personnel. Compliance concerns should be reported to the Compliance Officer directly, through the Intranet Compliance Hotline, or through the Compliance Hotline at 8181 (Toll free: 1-877-249-3280).

Accurate billing of health care services is dependent upon quality documentation by health care providers. All employees are expected to provide complete and timely documentation.

Accurate and timely documentation also depends on the diligence and attention of the physicians who treat patients in our facilities. All members of the medical staff are expected to provide complete, accurate, and timely medical record documentation.
Cost Reports
We are required by Federal and State laws and regulations to complete certain reports of our operating costs and statistics. It is our policy to follow all applicable requirements for the preparation and submission of the organization’s cost reports.

Financial Reporting
It is our policy to produce accurate and complete financial statements. All financial statements must reflect actual transactions, conform to generally accepted accounting principles, and not include false or misleading information.

Conflicts of Interest
A conflict of interest may occur if the outside activities, personal financial interests, or other personal interests of an OVHS&E employee or representative influence or appear to influence his or her ability to make objective organizational decisions. OVHS&E leaders, including department managers, senior management, and the Board of Trustees, must be particularly careful to recognize situations that may become a conflict of interest in the performance of their duties. Organizational leaders are required to disclose in writing any potential conflicts of interest on an annual basis. When a conflict of interest does occur, it should be promptly reported to the appropriate personnel.
**Substance Abuse**

We are committed to an alcohol and drug free work environment. OVHS&E employees and representatives are expected to report to work free from the influence of alcohol and drugs. Reporting to work under the influence of alcohol or other substance, which affects your ability to work safely and efficiently, will result in disciplinary action up to and including termination.

**Sanction Screening**

All OVHS&E employees and representatives are screened periodically through certain government databases to make sure they have not been excluded from participation in Federal health care programs. **All employees and representatives are required to disclose if they are or become excluded.**

**Equal Opportunity Employer**

We are committed to providing equal employment opportunities for all persons without regard to race, color, religion, creed, national origin, sex, age, ancestry, military status, veteran status, or disability requiring reasonable accommodations.
Statement of Non-Retaliation

It is our policy to encourage employees to report any violation or potential violation of this Code of Conduct. All employees and OVHS&E representatives are required to report any and all questionable activity to the appropriate personnel. This includes violations of our Code of Conduct, violations of OVHS&E policies and procedures, and violations of Federal health care program requirements. No disciplinary action will be taken against any person for the good faith reporting of illegal actions or violations of this code. However, employees can be disciplined for failure to report compliance violations.

Employees are required to report any questionable activity to the appropriate personnel

Disciplinary action will never be taken against any person for the good faith reporting of illegal actions or violations of this code

To obtain further guidance or to report a suspected violation of our Code of Conduct:

- **Discuss** the situation with your supervisor
- **Discuss** the situation with the Compliance Officer or a member of the Compliance Committee
- **Report** the issue through the Intranet Compliance Hotline
- **Call** the Compliance Hotline at 8181 (Toll free: 1-877-249-3280)
Questions and Answers

Q. What if I see something that seems wrong but I am not sure if it is a compliance problem?
A. You can discuss the situation with your department supervisor, with any member of the compliance committee, or with the compliance officer. You can also report the issue through the Intranet Compliance Hotline or the Compliance Hotline at 8181 (Toll free: 1-877-249-3280). You do not have to be sure something is a compliance issue to report. If something feels wrong, you should report it.

Q. Are compliance reports kept confidential?
A. The confidentiality of all compliance reports is protected within the requirements of the law. The identity of the person that reports the issue will also be protected. An employee will never be disciplined for the good faith reporting of a compliance issue.

Q. How can I report a compliance issue anonymously?
A. Both the Intranet Compliance Hotline and the Compliance Hotline at 8181 (Toll free: 1-877-249-3280) allow anonymous reporting of compliance issues.
CODE OF CONDUCT ATTESTATION

I ___________________________________ have received and read the OVHS&E Code of Conduct.
(print name)
I understand and will follow its requirements. I understand that the Code of Conduct applies to all OVHS&E
(including Ohio Valley Medical Center and East Ohio Regional Hospital) employees, senior management,
members of the organization’s Boards of Trustees, the organization’s medical staff and all representatives
including independent contractors when they are acting on behalf of OVHS&E.
________________________________ signature   _______________________ date

☐ Board Member
☐ Senior Management
☐ Employed Physician
☐ Independent Physician
☐ Employee ______________________________
   (department)
☐ Independent Contractor ______________________________
   (company name)