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Owner Janel Mudry
Area Corporate Compliance
Applicability MHS

Code of Conduct

POLICY:

Code of Conduct describes our business ethics policies and procedures and provides guidance to help ensure employee's duties and responsibilities are performed with absolute integrity and in an ethical and legal manner. Read the Code carefully. Be sure you understand it and the consequences of failure to comply with it.

If you have any questions regarding this Code, or find yourself facing a questionable situation, you should immediately consult your manager, any higher level manager, or the Corporate Compliance Office. Your employment requires you to report any concerns immediately. Be assured there will be no retribution for asking questions or raising concerns about this Code or any suspected instance of inappropriate conduct.

The Mon Health Code of Conduct is guided by its vision, mission and values.

RESPONSIBILITY:

Vision : Our exceptional team will provide an extraordinary patient, customer, visitor and resident experience, compassionate care and clinical excellence.

Mission:To enhance the health of the communities we serve, one person at a time.

Values:

- Integrity
- Commitment
- Accountability
- Respect

- Excellence

PURPOSE:

All employees are obligated to comply with the laws and regulations that govern the healthcare industry, as well as each individual hospital's policies and procedures. This Code provides guidance in carrying out daily activities within the appropriate ethical values and legal standards of conduct. It governs relationships with patients, customers, visitors, residents, physicians, third party payors, subcontractors, independent contractors, vendors, consultants, government agencies, and one another.

The Code conveys Mon Health's high ethical values and standards of conduct and is intended to ensure compliance with the laws and regulations which govern the healthcare industry and Mon Health's policies and procedures.

Mon Health is a dynamic organization and the environment in which it operates is one of increasing complexity. It is necessary for you to make many decisions every day and making the right ones is not always easy. The Code sets forth the basic expectations for personal and professional behavior.

Special Responsibilities of Leadership

All employees are obligated to follow the Mon Health Code, but leaders are to set the example and be a model for appropriate conduct. Leaders must also ensure those on their team have sufficient information to comply with the relevant laws, regulations, and policies, as well as the resources to resolve the ethical dilemmas. They must help create a culture within each individual hospital and the System that promotes the highest standards of ethics and compliance.

Guidelines:

1. **Patient, Customer and Resident Care** : Mon Health is committed to providing high-quality healthcare, products, and services to all patients, customers, visitors and residents in an ethical, professional, and cost-effective manner. Patients, customers, visitors, residents, or their representatives, are treated with respect and dignity. Information is provided regarding his or her rights and responsibilities, and those rights are protected throughout their care and treatment.
 - a. *All rights are upheld to make decisions regarding medical care and other rights in accordance with applicable state and Federal laws. Patients' are involved in all aspects of their care and informed consent for treatment is obtained.*
 - b. *Patients, customers, residents, or their representatives, are provided a clear explanation of their care, including diagnosis, treatment plan, their right to refuse or accept care, care decision dilemmas, estimate of treatment costs, and an explanation of the risks and benefits associated with available treatment options.*
 - c. *Patients, customers, residents and their representatives will be accorded appropriate confidentiality, privacy, security and protective services, opportunity for resolution of complaints and opportunity for pastoral counseling.*
 - d. *Each person is treated in a manner that preserves their dignity, autonomy, self-esteem, civil rights and involvement in their own care.*

e. *All employees receive education about patient, customer and resident rights.*

2. Admissions, Treatments & Referrals

- a. Mon Health treats people - not insurance policies. The decision to admit or discharge any person is **not** made on the basis of their insurance coverage or ability to pay. Each person presenting to an Emergency Department is entitled to a Medical Screening Examination by a Medical Professional prior to any determination of insurance coverage or ability to pay. The system will adhere to all aspects of the Emergency Medical Treatment and Active Labor Act (EMTALA) as amended
- b. Each patient, resident and customer is treated as an individual. Medical professionals develop treatment plans to meet the specific clinical needs of every patient utilizing a multidisciplinary approach. Treatment is provided in the least restrictive environment which is appropriate to the individual's needs.
- c. The system does not make payments or provide incentives to anyone for providing referrals.

3. Confidentiality

- a. Hospital employees and health care professionals possess sensitive, privileged information about patients, residents and customers. Mon Health is committed to maintaining confidentiality in strict accordance with the Health Information Portability and Accountability Act (HIPAA) as amended, as well as the Health Information Technology for Economic and Clinical Health Act (HITECH) as amended.
- b. Personally identifiable information is not released or discussed with others unless it is necessary to serve the patient, the customer or the resident; unless sharing the information is in the patient's best interest or required by law; or unless the patient, customer or resident has consented to such disclosure.
- c. Discussing a specific medical condition or providing any information about patients, residents or customers to anyone other than Hospital personnel who need the information, and other authorized persons for Treatment, Payment or Hospital Operations, will have serious consequences up to and including termination of employment. Employees should not discuss patients, customers or residents outside the facility, with their families or outside of designated care areas.
- d. The above-stated laws are designed to punish and deter computer crime and to increase the security all Electronic Medical Records. In compliance with the laws, Mon Health prohibits unauthorized access to its computer system either directly or by network or telephone. Destruction or corruption of electronically stored or processed data is prohibited. Persons who violate these rules will be prosecuted to the full extent of the law.
- e. In addition to keeping patient, customer and resident information confidential, Mon Health requires employees, vendors, providers, contractors, students and volunteers to hold the intellectual property, trade secrets and employee information in the highest confidence. This information must be supplied **only** to those who have a need to know and a legal right to possess the information.

4. Misuse of Propriety Information

- a. No employee, physician, or director shall misuse confidential or proprietary information belonging to another person or entity; not utilize any publication, document, computer program, information, or product in violation of a third party's interest in such product.

5. *Employment Practices & Workplace Conduct*

- a. Mon Health values its employees. Employees provide us with a wide compliment of talents, which greatly contribute to our success. We strive to create and maintain an environment in which all employees are treated with respect, dignity and fairness, where diversity is valued and opportunities are provided for professional advancement.
- b. Mon Health is committed to providing an equal opportunity work environment. We will comply with all laws, regulations and policies, including those related to non-discrimination in all of our personnel actions, and we expect our employees to do the same. Such actions include hiring, staff reductions, transfers, terminations, evaluations, recruiting, compensation, corrective action, discipline, and promotions.
- c. Discrimination of any type, by any one, will not be tolerated.

6. *Harassment*

- a. All employees have the right to work in an environment free of harassment. Mon Health does not tolerate harassment by anyone based on the diverse characteristics or cultural backgrounds of those who work with us. Degrading or humiliating jokes, slurs, intimidation or other harassing conduct is not acceptable in our workplace.
- b. Any form of sexual harassment is strictly prohibited. This prohibition includes unwelcome sexual advances or requests for sexual favors in conjunction with employment decisions. Moreover, verbal or physical conduct of a sexual nature that interferes with an individual's work performance or creates an intimidating, hostile or offensive work environment is not tolerated.
- c. Employees who observe or experience any form of harassment or violence should report the incident to their supervisor, the Human Resources Department, any member of management, or the Compliance Officer.

7. *Substance Abuse*

- a. To protect the interests of employees, patients, customers, visitors and residents, Mon Health is committed to an alcohol and drug free work environment. Mon Health has a "zero tolerance" policy when it comes to maintaining a workplace free from alcohol and other drugs of abuse and their effects. The use of alcohol or the use, possession or sale of controlled substances is prohibited on all of the Mon Health properties at all times. The use of alcohol or controlled substances is prohibited off premises during working hours including meal and break time and during non-working time under circumstances that can be reasonably viewed as undermining public confidence and/or damaging the reputation of the System. Therefore, employees must perform duties and responsibilities unimpaired by the presence of controlled substances or alcohol.
- b. Mon Health complies with all regulations governing the management and

distribution of controlled substances. Specifically, no employee or physician affiliated with Mon Health will illegally distribute any controlled substances including prescription drugs.

8. Weapons

- a. We prohibit employees from possessing firearms, other weapons, explosive devices or other dangerous materials on any of the Mon Health properties

9. Honest Communications

- a. No false or misleading statements shall be made to any patient, customer, resident, person or entity doing business with the Hospital about the products, policies or service of the System, its patients, customers, residents or its competitors.

10. Accounting, Billing & Coding

- a. Hospital records shall be prepared accurately, reliably, honestly and in accordance with established finance and accounting procedures. An employee must not enter false or misleading information into Hospital records.
- b. Federal and state laws and regulations govern third party billing for the insured patients and other individuals in our care. Mon Health does not condone and will not tolerate submission of false, fraudulent, inaccurate, incomplete or fictitious claims for payment or reimbursement.
- c. If a billing or coding error is detected, employees must immediately notify their supervisor.
- d. For coding questions, contact the Health Information Management (HIM) director. For billing questions, contact the Financial Services, or contact the Corporate Compliance Office..

11. Improper Influence

- a. Gifts or entertainment may not be solicited by Mon Health employees, physicians, or directors.
- b. Mon Health may not give or receive business obtained through the improper use of business courtesies, gifts or relationships.
- c. It is against the law, and policy, to give or receive any "remuneration" either in return for or to induce: (a) a referral: or (b) the purchase, lease or order of any good, facility, service or item. Remuneration is defined as anything of economic value, including kickback, bribe or rebate, in cash or in-kind. The opportunity to earn money may also be considered remuneration.
- d. Mon Health selects its suppliers on such factors as price, quality, performance and suitability of products or services, quantity, delivery, service, and reputation. Benefit should not be accepted or solicited from an existing or potential supplier that might compromise, or appear to compromise, and objective assessment of the supplier's products or services.
- e. Employees are to refrain from requiring a supplier to give up trade with our competitors or requiring a supplier to purchase Mon Health products or services in order to obtain or retain a supply agreement. Employees must also respect and

protect any confidential information shared by a supplier.

- f. Employees may not solicit or use their position with the Mon Health to secure a special discount or other favorable treatment for themselves or others not extended by the supplier to all employees.

12. **Competition & Antitrust**

- a. Employees are prohibited from soliciting, accepting or offering anything of value in exchange for referrals. Physicians are prohibited from making a referral to any entity in which they or their immediate family members have a financial relationship.
- b. In addition, employees must comply with applicable laws that regulate competition including antitrust. Under no circumstances may competitively sensitive information be exchanged with competitors, vendors, or other business associates.
- c. No employee, physician, or member of management may cooperate with competitors to fix prices or services, or discuss with them the possibility of doing so.

13. **Conflict of Interest**

- a. All employees, physicians, members of management, and board members must disclose any actual or potential conflicts of interest. Conflict of interest is defined as a conflict between private interests (such as family, friendship, or business interests) and one's official responsibility to Mon Health.
- b. A conflict of interest may occur if outside activities, personal financial interests or other personal interests influence or appear to influence an individual's ability to make objective decisions while performing his/her job responsibilities. A conflict of interest may also exist if the demands of any outside activities hinder or distract an individual from the performance of his/her job.
- c. Employees will exercise the best care, skill and judgment for the benefit of the organization and not use their position to profit personally or assist others in profiting at the expense of the organization. Actions or relationships that have the potential to create a conflict of interest must be disclosed to an immediate supervisor.

14. **Fraud and Abuse**

- a. No fraudulent or misleading claim will knowingly be submitted to any patient, customer, resident or payor (whether private or governmental). No payment or other benefit will be offered, accepted, or provided in return for the referral of patients, customers or residents.
- b. Examples of fraud and abuse include: backdating or altering entries in the medical record, coding of diagnosis or procedures which are not supported by documentation, submitting claims which are known denials, and billing for services not performed.
- c. If fraud or abuse is suspected, the Corporate Compliance Office should be contacted as soon as possible. For those who wish to remain anonymous, the compliance hotline is available. (1-844-536-3273)

15. **Environmental Compliance**

- a. Mon Health complies with all applicable environmental laws and regulations and operates with the necessary permits, approvals, and controls.
- b. Proper procedures are engaged with respect to handling and disposal of hazardous and bio-hazardous waste, including medical waste.
- c. Employees should immediately alert their supervisors about any situation they become aware of regarding the discharge of a hazardous substance, improper disposal of medical waste or other situation they might be aware of which may be damaging to the environment.

16. Safeguarding of System Assets

- a. All policies related to purchasing, storage and use of supplies and equipment, and payroll must be adhered to. Supplies and equipment may not be used for personal activities.
- b. You are "actually here" for payroll purposes only when the employee is their work station. If an employee records times for another employee it is considered time card fraud.

17. Political Activity

- a. Work time, funds, or resources shall not be used on behalf of or opposed to any political candidate or ballot issue, other than lobbying activity formally authorized by the Chief Administrative Officer or his or her designee.
- b. Political campaigning or soliciting of funds is prohibited on all Mon Health properties.

Getting Help

- All Mon Health employees are responsible to act in an ethical and legal manner. In certain instances, situations or issues may arise that are not outlined in the Code of Conduct. In instances when additional guidance or direction on any compliance related issue is needed, you should seek the advice of a supervisor, or contact the Corporate Compliance Office or the Human Resources Department.
- Because the subjects of ethical behavior and compliance with laws and regulations are important, a Compliance Hot Line is available. The number is **1-844-536-3273** The Hot Line is available to any employee or affiliated partner who has a question or concern about any legal or ethical question. The Hot Line is also available to employees who observe violations of the Code of Conduct described in this policy or other violations of laws and regulations. Employees can raise concerns without any fear of retaliation.
- The Hot Line is not intended to replace the current procedures and processes in place for communicating information and resolving operational conflicts or problems. The Hot Line number is posted throughout each facility and is available 24 hours per day, 365 days per year.
- Employees may ask questions or report suspected unethical or illegal acts anonymously if you so desire. Each report will be investigated.

GUIDELINES:

- Mon Health's reputation for honesty and integrity is one of our most valuable possessions.

Every employee assumes a responsibility to act in such a way as to preserve that reputation. The misdeeds of a single individual can undo years of dedicated service by thousands of others.

- The Code sets forth the general principles which govern the behavior of all the Mon Health employees, physicians, members of management, volunteers vendors and trustees. The specific policies, procedures and regulations which apply to this Code in actual practice may from time to time change, and should be consulted when evaluating an existing or proposed activity. Policies and sanctions may differ depending upon the legal relationship of an individual to each individual entity.
- In situations not specifically addressed in the Code, refer to the Human Resources for additional guidance.
- If you have questions regarding the Code, immediately consult a manager, supervisor, any other members of management, or Corporate Compliance Office.
- A **hotline** has been established to communicate your concerns if you wish to do so anonymously **1-844-536-3273**
- Violations of the Code of Conduct will be addressed at all levels with equality, fairness and without prejudice. In the event of a violation, employees shall be subject to corrective action (including the possibility of termination) in accordance with Human Resources policies and procedures, including but not limited to those contained in the Employee Handbook.
- There will be no retribution for asking questions or raising concerns about this Code or any suspected instance of inappropriate conduct.
- The Code of Conduct and Mon Health Compliance Program is based upon the Essential Elements as defined by the Office of the Inspector General, and is always available in the policy software repository. If you have any questions which you would like to have answered and /or added to this document, please submit them to the Corporate Compliance Office.

REFERENCES:

E-dition of Joint Commission – Standard HR 01-04-01 – Accessed September 21, 2018

Approval Signatures

Step Description	Approver	Date
Administrative Approval	Edward Phillips: Chief Legal Officer and General Counsel	4/6/2021
	Joanne Liptock: Compliance Coordinator	4/2/2021