

# CORTLAND REGIONAL MEDICAL CENTER COMPLIANCE HANDBOOK

January 2010

Dear Employee:

As part of Cortland Regional Medical Center's Compliance Program, we are pleased to provide you with a copy of our Compliance Handbook, which includes a copy of our *Code of Conduct* standards. The standards contained within the handbook reflect our commitment to conduct business and deliver health care in an exemplary fashion. Please keep in mind, however, that the standards contained within the handbook are only part of our larger compliance program. Reporting violations of the standards and your own personal involvement in the compliance process are just as important.

The *Code of Conduct's* standards have been, and will continue to be, developed by our employees. The standards set forth in the *Code of Conduct* apply to the entire hospital community, which includes: employees, volunteers, physicians, and the Board of Trustees, as well as any other individuals working on behalf of CRMC. Each of the standards addresses our collective voice in the many arenas in which health care delivery takes us in our day-to-day operations. The standards define the high expectations we place on ourselves and on those who work on our behalf. Finally, the *Code of Conduct* represents a reaffirmation of our long-term commitment to compliance and quality of service to our patients, their families, and the community we serve.

Our compliance program depends upon everyone's participation for its continued success. We have pledged to uphold the standards set forth in the *Code of Conduct* and encourage you, in turn, to do the same. Together, we can continue to strengthen the fine reputation of Cortland Regional Medical Center.

Sincerely,



Brian Mitteer  
President/CEO

## Contents

Introduction. . . . .	1
Your Obligation to Report. . . . .	1
Non-Retaliation. . . . .	1
How to Report a Violation. . . . .	2
Reporting Violations. . . . .	2
Receipt of the Code of Conduct. . . . .	2
Our Code of Conduct. . . . .	3
Standard 1 – Quality of Care and Services. . . . .	4
Standard 2 – Privacy and Confidentiality. . . . .	4
Standard 3 – Coding/Billing Integrity and Record Keeping. . . . .	5
Standard 4 – Customer Service. . . . .	5
Standard 5 – Compliance with Laws and Regulations. . . . .	5
Standard 6 – Work Place Conduct and Employment Practices. . . . .	6
Standard 7 – Research. . . . .	7
Standard 8 – Conflicts of Interest. . . . .	8
Standard 9 – Protecting Property, Assets and Information. . . . .	8
Frequently Asked Questions. . . . .	9
Our Mission – Our Vision – Our Strategy – Our Value Statements. . . . .	10

# OUR CORPORATE COMPLIANCE PROGRAM

## *Introduction*

The Cortland Regional Medical Center (CRMC) Corporate Compliance Program reflects in the clearest possible terms our commitment to exemplary health care and business operations. A key component of the compliance program is our *Code of Conduct*, which describes what is expected and required from our employees, physicians, students, volunteers, and people with whom we do business.

The Board of Trustees of CRMC oversees the Compliance Program and has delegated responsibility for the program to the CEO and a Corporate Compliance Officer (CCO) appointed by the Board of Trustees on the recommendation of the President / CEO. To assist the CEO and CCO, a Corporate Compliance Committee was established to provide additional oversight and guidance. These individuals are available to assist you in complying with the laws, regulations, policies and procedures that govern our day-to-day operations and in meeting the standards included in our *Code of Conduct*.

Our Corporate Compliance Officer is Lesley Newman and members of our Corporate Compliance Committee include: Brian Mitteer, President/CEO; David Hardy, Senior Vice President of Operations/CFO; Denise Mironti, Senior Vice President Patient Care Services; Robert Karpman, MD, Vice President Medical Affairs; Chris Kisacky, Vice President of Professional Services; Denise Wrinn, Vice President Human Resources; Jeff Earle, Vice President Long Term Care Services; Eline Haukenes, Vice President CMH Services and Director of Long Term Home Health Care; Tom Hallisey, Vice President of Information Management; Karen Clark, Director of the Business Office; Nancy Fuller, Director, Health Information Management and HIPAA Privacy Officer; Heather McCall, HIPAA Security Officer; Joan Skawski, Director Quality Improvement; and Gloria Simonson, Director of Risk Management.

## *Your Obligation to Report*

Any situation that you believe violates our *Code of Conduct*, our policies and procedures, or the laws and regulations that affect us must be reported immediately. Failure to report a known violation may result in disciplinary action, even if you were not involved.

## *Non-Retaliation*

No disciplinary action or other form of retaliation or revenge will be taken against any staff member who, in good faith, reports a suspected violation. However, reporting a violation does not protect an employee from appropriate disciplinary action for their own involvement or conduct; nonetheless, self-disclosure may be viewed favorably and may serve to reduce potential disciplinary actions.

### ***How to Report a Violation***

Suspected violations should be reported first to your supervisor. If you are unable to report your concern to your supervisor because you believe they may be involved in the situation you wish to report, you may report your concern directly to their manager or senior manager. If, for whatever reason, you are uncomfortable reporting your concern through the normal chain of command, you may also report your concern to any member of the Corporate Compliance Committee or to any of the following resources:

1. Corporate Compliance Officer (607) 428-5150
2. HIPAA Privacy Officer (607) 756-3687
3. Compliance Hotline (607) 428-5151
4. Compliance Fax (607) 428-5069
5. Any member of the Corporate Compliance Committee

You may make your report anonymously, in person, by telephone, or in writing. Written reports may be made by email, regular mail, or interoffice mail. Anonymous reports may be made over the Hotline or in writing.

When reporting, employees should provide as much detail as possible about the reported event so that CRMC can undertake an efficient and prompt investigation and take any needed remedial action.

### ***Reporting Violations***

If you have a question about whether you should report, call your Supervisor, Department Manager, or the Compliance Officer. You may contact the Compliance Officer at any time to discuss a concern. In the absence of the Compliance Officer, you may contact any member of the Compliance Committee, Senior Management, or the Human Resource Department. Whenever possible you should discuss your concern with your supervisor first.

The following guide should be used when reporting a suspected violation or unethical behavior.

1. **DO** immediately report what you know or suspect;
2. **DO NOT** confront the person suspected of acting illegally;
3. **DO NOT** attempt to “investigate” the conduct yourself;
4. **DO NOT** discuss your concerns with anyone, whether an employee or an outsider other than to make a report to your supervisor, the Corporate Compliance Officer, member of the Corporate Compliance Committee, Senior Manager or the hotline.

### ***Receipt of the Code of Conduct***

All staff members will sign and date a statement that reflects their knowledge of and commitment to this *Code of Conduct*.

## OUR CODE OF CONDUCT

The Board of Trustees has issued this *Code of Conduct* to provide guidance to ensure that our work is done in an ethical and legal manner. In addition, it emphasizes the shared common values that guide our actions and help resolve questions about inappropriate conduct in the workplace.

The principles set forth in our *Code of Conduct* are mandatory and must be followed by all CRMC employees, staff, and affiliated persons. Failure to comply with the *Code of Conduct* is a serious matter, which may lead to disciplinary action up to and including immediate termination.

While we have attempted to be comprehensive, our *Code of Conduct* does not cover every possible situation or question that may arise; however, it does provide a basic description of unacceptable conduct or performance that may lead to corrective action or termination of employment. Prohibited actions are not excused simply because they were taken with the knowledge of, or at the direction of, a supervisor. Therefore, common or customary actions may violate the *Code of Conduct*.

Your adherence to our *Code of Conduct*, as well as all CRMC corporate and department policies, regulations, and rules of conduct is expected. If you have any questions, please talk to your supervisor. Management has been asked to be available and responsive to all staff questions and concerns.

Our *Code of Conduct* is a “living document.” As such, it will be revised periodically to respond to changing conditions and better reflect our commitment to:

**Our Community:** We are committed to improving the health of the community we serve by providing quality health care services in a caring and efficient manner without discrimination.

**Our Employees and Medical Staff:** We are committed to creating a work environment in which employees and medical staff are treated respectfully, fairly, and given opportunities for professional development.

**Our Assets:** We are committed to protecting our assets, and the assets of others entrusted to us, against loss, theft, destruction, and misuse.

**Our Payors:** We are committed to maintaining timely and accurate patient records and to bill only for services actually rendered as documented in patient medical records.

**Our Vendors:** We are committed to avoiding conflicts, or the appearance of conflicts, between our private interests and our responsibilities as employees and staff.

**Our Regulators:** We are committed to complying with all laws and regulations and to operating in an environment where the health, safety, privacy, and comfort of patients and employees come first.

## **STANDARD 1**

### ***Quality of Care and Services***

We are committed to improving the health of the community we serve by providing the highest quality health care services in a caring and efficient manner.

- A. We will respect the uniqueness of each person within our community and assure that each is treated with respect, dignity, and courtesy at all times.
- B. We will not discriminate in the provision of care and services.
- C. We will consider a patient's culture, religion, and personal requests in determining and executing the plan of care. However, personal requests by patients and/or their family members will be superseded by our obligation to deliver quality care.
- D. We will require all clinicians to provide care that is appropriate to each patient without regard to either the financial ability of the patient to pay or to the financial consideration that may result to the clinicians because of ordering or not ordering needed care.
- E. We will ensure that each patient receives quality care regardless of his/her ability to pay or source of payment.
- F. We will provide treatment to our patients in a safe manner based on their clinical, psychological, and other needs.
- G. We will seek to provide patients with products that perform as intended and that comply with all applicable laws, regulations, and professional standards.

## **STANDARD 2**

### ***Privacy and Confidentiality***

We are committed to fulfilling regulatory standards designed to handle all facets of information management, including reimbursement, coding, security, and patient records.

- A. We will protect against the unauthorized use and disclosure of protected health information, where prohibited.
- B. We will not disclose restricted/confidential information or documents.
- C. We will not permit any person to examine or make copies of any restricted/confidential information unless authorized to do so.
- D. We will restrict access and use of each element of protected health information to only those persons who have a need to utilize the information in the fulfillment of their tasks.

## **STANDARD 3**

### ***Coding/Billing Integrity and Record Keeping***

We are committed to maintaining timely and accurate patient records and to billing only for services actually rendered, as documented in patient medical records.

- A. We will take steps to ensure that all bills submitted for payment are accurate and comply with federal and state laws and regulations and will audit our billing practices to ensure accuracy.
- B. We will ensure that CRMC bills for services, using only billing codes that accurately describe the services that were provided.
- C. We will take immediate steps to alert the payor, correct the bill, and refund credits when due if inaccuracies are discovered in a bill that has already been submitted.
- D. We will maintain timely, accurate, and complete medical records concerning each patient treated at a CRMC facility.

## **STANDARD 4**

### ***Customer Service***

We are committed to applying the customer service standards that are core to our values to every interaction with every individual, at all times focusing on serving our patients and families.

- A. We will respect and protect the dignity of each person.
- B. We will treat customers with courtesy at all times.
- C. We take pride in our work environment and recognize customers as our responsibility at all times.
- D. We will ensure our customers' right to privacy and modesty and will maintain a secure and trusting environment.
- E. We will maintain professional behavior and dress to build customer confidence.
- F. We will provide service in a prompt, timely manner, putting the needs of customers first.

## **STANDARD 5**

### ***Compliance with Laws and Regulations***

We require all staff members to conduct their individual duties and all CRMC operations in a manner that meets all applicable legal, ethical, and regulatory standards.

- A. We will not pursue any business opportunity that requires action in unethical or illegal activity.
- B. We will not participate in any corrupt business practice, including bribery, kickbacks, or payoffs.
- C. We will maintain all business data, records, and reports completely, accurately, and truthfully. All accounting books and records will be

maintained according to generally accepted accounting practices and internal control procedures of CRMC.

- D. We will ensure all marketing and advertising by CRMC is truthful, fair, accurate, and complete. We will not make any false or misleading statements about CRMC or its services or about another organization or its services.
- E. We will ensure all contracts with clinicians and referral sources detail the specific services to be provided. Each proposed contract will be reviewed and approved in advance by compliance counsel.
- F. We will ensure every contract payment or other benefit provided to clinicians and referral sources are for the services and at the rate required by a written contract.
- G. We will comply with all federal copyright laws as they pertain to licensing software products, as well as printed and audio-visual materials.
- H. We are committed to maintaining an environment of care in which all CRMC facilities comply with governmental and regulatory rules that promote workplace health and safety. Employees are expected to promptly disclose any condition hazardous to human health or the environment. CRMC will take immediate action upon becoming aware of such conditions.

## **STANDARD 6**

### ***Work Place Conduct and Employment Practices***

We are committed to creating a work environment in which employees, physicians, and others are treated respectfully and fairly and are afforded opportunities for professional development.

- A. We will not discriminate. We will hire, train, promote, and pay on the basis of personal competence and potential for advancement without regard to race, color, religion, sex, sexual orientation, national origin, age, disability, or other classifications protected by law or CRMC policy.
- B. We will maintain zero tolerance for all conduct that is sexually harassing, abusive, or offensive toward our staff, physicians, volunteers, and students.
- C. We will not tolerate workplace violence. As part of our commitment to provide a safe workplace, we will maintain a work environment free of misconduct that harasses, disrupts, or interferes with an individual's work performance, or creates an intimidating, offensive, or hostile environment, which includes threats or acts of violence in the workplace. All persons within CRMC facilities will:
  - 1. Refrain from any threats or acts of violence and immediately report any threats or acts of violence to appropriate personnel and/or security.
  - 2. Not possess firearms, other weapons, explosive devices, or other dangerous materials while on CRMC property.

- D. We must remain free of the influence of illegal drugs or alcohol, and we will not tolerate the non-prescribed use of controlled substances. (Questions or concerns about effects of prescribed medications and their effect on your job performance should be referred to your supervisor.)
- E. Some staff members routinely have access to prescription drugs, controlled substances, and other medical supplies. We require that these items be maintained, dispensed, and transported in compliance with laws and regulations and then only by authorized individuals.
- F. We will not allow persons to report to work, or otherwise provide services at CRMC, unless they possess the mental acuity and sharpness necessary to perform their tasks in a safe and prudent manner.
- G. We will maintain the integrity and quality of our job performance by ensuring that staff members are familiar with applicable laws, rules, and regulations governing their area of work. CRMC will only employ those who possess the proper experience and competencies required to fulfill their tasks. In this regard CRMC will:
  - 1. Ensure that staff members who provide patient care are properly licensed and trained.
  - 2. Rely on employees to report deficiencies or errors to supervisors for resolution.
  - 3. Identify areas for improvement and take steps to make positive changes.

## **STANDARD 7**

### ***Research***

We are committed to following ethical standards in any research conducted by physicians and other professional staff.

- A. We will notify patients whose personal physician proposes to engage in or perform research affecting their care or treatment that they have the right to refuse such participation and not compromise their health care. Also, patients will be:
  - 1. Given a description of the research/treatment and expected benefits.
  - 2. Advised of potential discomfort and risks of the research /treatment.
  - 3. Given a description of alternative beneficial services, if available.
- B. We will not inappropriately bill for experimental or unapproved drugs or devices.
- C. We will not misuse or abuse research information.
- D. We will apply for and administer grant funds in accordance with the terms of the grantor.

## **STANDARD 8**

### ***Conflicts of Interest***

We are committed to regulating our activities to avoid conflicts of interest, actual impropriety, and/or an appearance of impropriety.

- A. We have policies to guide employees in determining conflicts of interest and the appropriateness of activities or behaviors with vendors, providers, contractors, third party payers, and government entities.
- B. We prohibit staff, physicians, and others affiliated with CRMC from using their positions, or knowledge obtained through their positions, to profit personally or to assist others in profiting at CRMC's expense.
- C. We conduct all business transactions with vendors, contractors, and other third parties free from inducements intended to influence our decision-making.
- D. We make sure preferential treatment is avoided when CRMC enters into any financial arrangement with a current or former trustee, or current or former employee. The nature of such proposed arrangements must always be disclosed fully to the appropriate corporate officers.
- E. We do not solicit or accept anything of value, including monetary gifts, trips, or discounts, which would suggest or create any obligation from employees, vendors, or others. Such gifts, if received, are to be returned. We may accept and retain from vendors non-monetary, unsolicited gifts such as advertising items, not to exceed \$50.00 in value. Cash gifts, including gift certificates, may not be accepted.
- F. We ensure that when business is placed with any company in which a CRMC employee has a family relationship that no conflict of interest exists. Information about any potential conflict of interest must be disclosed in advance and written permission secured from the appropriate CRMC authority. Such permission is not given if the practice violates applicable laws or policies.
- G. We will avoid frequent acceptance of elaborate meals, refreshments, or entertainment from vendors.
- H. We will not accept outside employment ("moonlighting") unless that employment is disclosed to management.

## **STANDARD 9**

### ***Protecting Property, Assets, and Information***

We are committed to protecting both our assets, and the assets of others entrusted to us, against loss, theft, destruction, and misuse.

- A. We will protect CRMC assets, property, facilities, equipment and supplies and others' property from theft, damage, or other misuse.

- B. We will not disclose information, directly or indirectly, or use it for any purposes except as required in the course of our employment with CRMC.
- C. We will refrain from discussing restricted/confidential information in any public area, such as open office areas, elevators, hallways, etc.

## **FREQUENTLY ASKED QUESTIONS**

### **1. What should I do if I see a violation?**

Report violations immediately. Try to follow the normal “chain of command” in your department. If you are not comfortable doing this, contact the Corporate Compliance Officer, a member of the Compliance Committee, or Human Resources.

### **2. Will an anonymous call show up on a caller ID?**

Calls made to the Compliance Office and / or to the Compliance Hotline are anonymous. Neither have caller ID and no attempt will ever be made to trace a call. Therefore, unless you choose to identify yourself calls made to the Compliance Officer or to the Compliance Hotline will remain anonymous.

### **3. What kind of information should I report?**

Report fraud and ethical abuses such as inappropriate billing, inappropriate relationships with vendors, etc.

### **4. How will I know the violation has been corrected?**

All allegations of fraud and abuse will be investigated thoroughly. If the problem was in your immediate work area, you may see a change in procedures or potentially a change in personnel.

### **5. Can I accept season football tickets to the Carrier Dome from a vendor that I do a lot of business with?**

No. You should not accept a gift of this type. Only gifts of nominal value (\$50.00 or less) should ever be accepted, and it is best never to keep any personal gifts.

### **6. Someone wants to pay me \$200 to design a web page for her home-based business, but since I don't have a computer at home, I want to use my computer at work during non-work time. Can I do this?**

No. Use of CRMC property for personal business is not permitted. In other words, you may not use CRMC assets for someone else's business.

### **7. I am a RN on a med-surg unit where we do lots of blood transfusions. However, my religion does not permit blood transfusion, so I always ask not to participate in this procedure.**

**So far, it has been allowed, but my supervisor says I may have to participate in the future. Do I have to?**

CRMC's philosophy is to respect everyone's religion, including yours. CRMC and your supervisor will make every effort to meet your request. However, if a patient's care could be compromised without your assistance, you will be required to participate in the procedure.

- 8. My supervisor sends me e-mail messages that are suggestive and offensive. When I discussed this issue with him, he did not take me seriously. He continues to send me these offensive e-mails. I no longer want to open his e-mails, yet I must in order to do my job. I am afraid to take this issue further, because he does my annual performance review.**

The supervisor's behavior described above is inappropriate conduct. CRMC will not tolerate any type of sexual harassment. Sharing sexually suggestive e-mail messages or other unwelcome sexual advances do not belong in the workplace. If you encounter unwelcome sexual advances, you can address it using your normal chain-of-command or you may directly call Human Resources, the Compliance Officer, or member of the Compliance Committee.

- 9. I have a family member who recently received treatment at the facility where I am employed; however, he is not telling the family about his condition. May I access his records, so I can explain his condition to my family?**

No. Access and use of protected health information is only for those persons who have a need to utilize the information to fulfill the tasks of their assigned job. If your job requires you to access this information, you must not disclose this confidential information to his family members.

## OUR MISSION

Cortland Regional Medical Center provides quality healthcare with skill and compassion, meeting the lifelong healthcare needs of all citizens of Cortland and the surrounding communities.

## OUR VISION

Cortland Regional Medical Center will be the best choice for Quality Healthcare.

## STRATEGY STATEMENT

“Patient Centered and Performance Focused”

## VALUE STATEMENTS

**Professional Accountability** – We are accountable for actions, attitude, and appearance.

**Quality Health Care Leader** – We provide the highest quality care to our customers with educated and skilled staff as well as appropriate state of the art equipment.

**Service Excellence** – We listen to our customers and strive to meet or exceed their expectations.

**Professional Communication** – We are committed to communicating without fear or intimidation in an open, honest, clear, and respectful manner.

**Market Leadership** – We will be proactive leaders in market development.

**Fiscal Responsibility** – We will be responsible as individuals and as an organization with all resources.