


COMPLIANCE POLICY & PROCEDURES	
Code of Conduct	
	EFFECTIVE DATE: 9/1/2014 POLICY & PROCEDURE #:C.010
	REVISION DATES: 4/18/2022, 10/2023, 04/2024
	LAST REVIEWED: 02/2022, 10/2023, 04/2024
	FUNCTIONAL AREAS: All Departments
	POLICY OWNER: Corporate Compliance Officer
KEYWORDS: code of conduct, compliance, ethics, conflict of interest	

PURPOSE:

To provide guidance that describes behavioral expectations for Board Members, Providers, Employees and Volunteers while affiliated with Neighborhood Healthcare (NHcare).

POLICY:

- A. This Code of Conduct has been developed with employee input from all levels of our organization and has been approved by the Neighborhood Healthcare Board of Directors. The Code reflects our vision and mission to treat everyone with compassion and dignity and helps to ensure that all employees, volunteers, and board members have a clear understanding of the business, professional and personal ethics that are expected of us in the workplace. The behaviors and conduct described in the Code are expected of everyone in the Neighborhood Healthcare Family – employees, volunteers, medical staff, and board members.
- B. We understand that working in the health care industry is extremely challenging, and sometimes the right course of action can be unclear. The Code of Conduct is intended to help you to respond to common questions and issues you may encounter in your daily work. The Code is designed to support “Right Relationships”:
 - 1. Relationships with patients and others in our care, relationships with our co-workers and business partners.
- C. Staff must review and become familiar with the Code of Conduct, particularly those areas that apply to your everyday work activities. When faced with a difficult decision or uncertainty, you should ask questions and seek advice from your supervisor or other appropriate resource. Most important, you’re responsible for speaking up about behaviors or actions that may be inconsistent with the Code of Conduct. If you have a question or concern that is not specifically address in the Code, please consult one of the many resources listed for assistance.

1. Our Responsibilities

- a. The Code of Conduct applies to all employees, contract workers, volunteers, medical staff members, and board members of NHcare.

- 2. All Board Members, Providers, Staff and Volunteers have a responsibility to:**
 - a. Review and follow the Code of Conduct, paying particular attention to those areas that apply to your everyday work activities.
 - b. Ask questions when you're uncertain.
 - c. Speak up when you're concerned about behavior that is inconsistent with the Code of Conduct.
- 3. Responsibilities of Leaders**
 - a. Leaders in NHcare, including managers, supervisors, medical staff leaders, program directors, senior executives, and board members, are held to a higher standard of responsibility. Leaders serve a key role in receiving and responding to questions and concerns raised by employees and others. How leaders respond to questions and concerns posed to them is key to others having the trust and confidence to bring important matters to their attention.
- 4. NHcare leaders have a responsibility to:**
 - a. Serve as a role model for our mission by carrying-out responsibilities with the highest degree of personal integrity.
 - b. Clearly communicate to others, expectations for the highest standards of ethical behavior.
 - c. Promote a culture of trust, open communication, and respect.
 - d. Hold others accountable for behavior inconsistent with our mission, and the Code of Conduct.
 - e. Encourage others to raise issues and concerns so they can be appropriately addressed.
 - f. Respond timely and appropriately to issues and concerns.
 - g. Support and promote NHcare's policy of non-retaliation against anyone who raises issues and concerns in good faith.
 - h. Learn and follow applicable laws and regulations that affect business activities with physicians or other organizations that refer patients to NHcare facilities.
- 5. Relationships with Patients and Their Families**

NHcare exists to deliver excellent, high-quality health care services in the communities we serve. Patients who entrust their care to us, as well as their families and representatives, are our number one priority. Whether you are directly involved in the delivery of care to patients, or in a role that indirectly supports such services, you are expected to:

 - a. Deliver services with compassion, dignity, and respect for everyone in your care, including their family members and other representatives.
 - b. Maintain a positive, courteous and customer-service oriented attitude and approach to those you serve.
 - c. Speak kindly and patiently to patients, their families, and others.
 - d. Act in the best interests of patients and others in your care.
 - e. Respond to requests for information, input or assistance from patients, family members and other representatives, always being aware of privacy concerns, in a timely and supportive manner.
 - f. Deliver services in accordance with all professional standards that apply to your position.
 - g. Follow NHcare's policies and procedures that promote a safe patient care environment.
 - h. Involve patients, their family members and representative in care decision-

- making, including respecting patient and family preferences, when appropriate.
- i. Maintain complete, timely and accurate medical records.
 - j. Protect the privacy and confidentiality of all medical and other information of those in your care.
 - k. Clearly explain the outcome of any treatment or procedure to patients, family members and representatives as appropriate, especially when outcomes differ significantly from expected results.
 - l. Address ethical conflicts that may arise in patient care, including end-of-life issues.

5. Relationships with Co-Workers and Others

The delivery of high-quality, effective patient care requires teamwork among all individuals involved. Data shows that the work environment has a direct effect on the quality and safety of care delivered. Trust and respect are important factors toward ensuring that all team members utilize their talents, perspectives, and ideas to the best of their abilities. At NHcare, everyone is expected to treat others as they would like to be treated. Whether an employee, contract worker, volunteer, or medical staff member of NHcare, you are expected to:

- a. Treat others with honesty, dignity, fairness, and respect.
- b. Maintain a positive, courteous and customer-service oriented attitude and approach. Speak kindly and patiently to your co-workers and others who serve you.
- c. Commit to working with others in a supportive, team environment.
- d. Support co-workers in providing excellent care and services by responding to requests for information, input, or assistance in a timely manner.
- e. Communicate with others in a clear, open, and honest manner.
- f. Attempt to address any differences you have with co-workers directly with the individuals involved. Physical violence against co-workers is prohibited.
- g. Respect the diversity of others, including racial, ethnic, gender, religious and other differences.
- h. Limit physical contact, being respectful of the personal space of co-workers and others who serve with you. Report harassment, intimidation, or violence of any kind that you witness in the workplace.
- i. Respect the individual privacy of co-workers and others.

6. Relationships with Vendors, Other Business Partners, and Competitors

Employees and other individuals working on behalf of NHcare have a duty to act in the best interest of the organization. This means avoiding situations where relationships with vendors or other business partners could appear to influence decisions you make involving NHcare.

Senior executives, as well as board members, must be particularly sensitive to actual or potential Conflicts of Interest. As a tax-exempt organization, transactions involving NHcare senior executives and board members are subject to special laws and regulations. Failure to follow these laws and regulations can result in significant fines and penalties against NHcare and the involved persons, including managers who authorize such activities. As an employee, contract worker, senior executive or board member of NHcare, you are expected to:

- a. Maintain a positive, courteous and customer-service oriented attitude when interacting with vendors and business partners.
- b. Maintain objectivity and avoid actual or potential conflicts of interest that might interfere with your responsibilities in NHcare. When dealing with conflicts of interest, always remember that appearances do count!
- c. Always make decisions in the best interests of NHcare.
- d. Follow NHcare's policies and procedures addressing conflicts of interest. In general, these policies require that you discuss and obtain the advance approval of your supervisor or higher-level manager for any situation that could present an actual or potential conflict of interest with your work in NHcare.
- e. Follow NHcare policies requiring annual disclosure of any actual or potential conflicts of interest, as applicable to your position.

The following are a few examples of activities that can create a conflict of interest:

- i. Outside Employment – In some cases, employees work for both NHcare and another company that either does business with or competes with NHcare. Before considering an offer to work for an organization that either does business with or competes with NHcare, you should discuss possible conflict of interest issues with your supervisor or higher-level manager.
- ii. Service on Outside Boards – Employees are encouraged to actively participate in various charitable or civic organizations that benefit our communities. Before accepting an appointment to the board of any organization that may represent a conflict of interest obtain the approval of your supervisor.
- iii. Financial Interests – It is generally considered to be a conflict of interest to do business with or recommend that NHcare do business with a company in which you or a family member has a financial interest (excluding investments in large publicly held companies) or business relationship. Obtain the advance approval of your supervisor in all such situations.

7. Relationship with the Government and Other Payers

Health care organizations, including NHcare, are subject to numerous laws and regulations that impact how we deliver health care services. In addition, our federal and state governments are responsible for the payment of a significant portion of the health care services we provide to patients covered by Medicare and Medicaid programs. Many laws and regulations are complex and challenging to apply in our rapidly changing industry. Nevertheless, NHcare is committed to fully complying with all laws and regulations that apply to our health care mission.

Whether you are an employee, contract worker, volunteer, medical staff member, senior executive or board member of NHcare you are expected to:

- a. Act with honesty and integrity in all your business activities involving NHcare.
- b. Follow all laws and regulations that apply to your work and ask for assistance if you have questions about how they affect you.
- c. Follow all requirements of government (e.g., Medicare and Medicaid) and other third-party payers such as insurance companies, who pay for the health care

services we provide. These requirements generally include maintaining complete and accurate medical records submitting only complete and accurate claims for services provided, and protecting the privacy and security of the health information we collect.

- d. Participate in training and education offered by NHcare on those laws and regulations that apply to your work responsibilities.
- e. Cooperate with any government investigation. Never, under any circumstances, destroy or alter documents requested as part of a government investigation, or lie or make false statements to a government investigator. In addition, never offer gifts or other items of value to government representatives.
- f. If your work responsibilities include business activities with physicians or other organizations that refer patients to NHcare you must be familiar with and follow the laws and regulations that affect those business activities. These include the Stark, Anti-Kickback and IRS laws and regulations.

8. Relationship with Neighborhood Healthcare (NHcare)

You also have a relationship with NHcare and the communities we serve. As with other relationships, there are certain expectations and commitments of both parties to the relationship. As an employee, contract worker, volunteer, senior executive, or board member of NHcare, you are expected to:

- a. Support NHcare's Mission and vision through your behaviors, actions, and decisions.
- b. Create a culture that promotes a positive workplace.
- c. Represent the organization honestly and ethically in all your work activities and ask for assistance if you have questions.
- d. Properly use and protect NHcare's resources including supplies, equipment, staff time and talents, and financial assets.
- e. Use good judgment and follow your organization's policies for business travel and entertainment.
- f. Prepare and maintain accurate and complete financial records including account, budgeting, time and attendance, expense and other financial data and information.
- g. Retain all clinical, financial and employee records in accordance with NHcare record retention policies.
- h. Respect the environment and follow your organization's policies for the handling and disposal of hazardous and infectious waste.
- i. Properly use and protect the confidentiality of business or other information you use or encounter in your work with NHcare.
- j. Maintain appropriate professional licenses, certifications and other credentials required of your position.
- k. Commit to your ongoing learning and development through timely completion of education and training assignments.

A relationship is not a one-way street. In recognizing your commitment to our organization, you should also expect NHcare to:

- a. Treat you with honesty, dignity, fairness, and respect.
- b. Provide you a meaningful, rewarding work experience.
- c. Provide you a safe and supportive work environment free of harassment, intimidation, or violence.
- d. Provide encouragement and support for your continued learning and

- development.
- e. Provide resources for your training and development to assist your understanding of the various laws, regulations and organizational policies that apply to your work.
 - f. Promote a respectful work environment that allows you to freely ask questions, seek clarification when needed, and raise issues and concerns in good faith without fear of harassment or retaliation.
 - g. Have your requests for information, input or assistance responded to in a timely and supportive manner?

Questions to Ask Yourself: When faced with a difficult issue or situation where you are unsure what to do, the following questions may assist you in making the right decision.

- i. Is the decision consistent with the mission and vision of NHcare?
- ii. Will the decision affect the quality of patient care?
- iii. Would I be comfortable telling my family about the decision or having it described on television or in a newspaper?
- iv. Could the decision impact the reputation of NHcare if made known to the public?
- v. Could the decision impact the reputation of NHcare if made known to the public?
- vi. Could the decision negatively impact commitments the organization has made with employees, physicians, or the communities we serve?
- vii. Is there something about the decision that bothers me, makes me feel uncomfortable, or just doesn't "feel right"?

If the answer to any of these questions is "yes," seek the assistance of a supervisor or the Compliance Officer.

Delivering health care services is an increasingly challenging task, with complex and ever-changing rules and regulations that apply to our operations. As a result, there will likely be times when answer to a particular issue or situation is not clear. As an employee of NHcare you are responsible for seeking answers to your questions or concerns. Fortunately, many resources and options are available to assist you.

Your Supervisor or Manager – This is usually the best place to start in getting answers to your questions. Because this individual understands the work you do he or she may already have the information you need or can direct you to the right resource.

Higher – Level Manager – If you are not comfortable asking your supervisor or manager or do not agree with the answer you receive, consider discussing the issue with a higher-level manager, such as a Director in NHcare.

Human Resources (HR) – NHcare's Director of HR Manager can likely answer many of your questions, including assisting you in addressing workplace-related concerns.

Risk Management or Quality Coordinator – If you have questions or concerns

related to patient care or workplace safety you may also contact NHcare's Director of Nursing (DON).

Privacy and Security Officials – Contact NHcare's Privacy and Security Officials if you have questions or concerns related to the use and/or protection of patient health or confidential business information.

The Corporate Compliance Officer – The Compliance Officer is a member of senior management responsible for the operation of the Compliance Program and the Code of Conduct at NHcare. The Compliance Officer can assist you in obtaining answers to your questions and concerns.

Compliance Hotline – We encourage you to use one of the resources above to address your questions and concerns. However, if you are not comfortable using any of these resources, or if these resources have not fully resolved your concern, you can call the Director of HR at 1-760-520-8371 or NHcare's Compliance Hotline at 888-692-6675.

Remember:

The most important thing you can do is to keep asking questions until you are comfortable with the answer.

6. Non-Retaliation Policy

Ultimately, it is your responsibility to report concerns. We understand that you may not wish to report concerns if you feel you may be subjected to retaliation or harassment. NHcare's policy strictly prohibits retaliation in any form against an individual reporting an issue or concern in good faith. Retaliation is subject to discipline up to and including dismissal from employment, suspension of medical staff privileges, or termination of business relationships, as applicable, in accordance with NHcare's policies.