

POLICY

Lafayette General Health (LGH) is committed to the highest ethical standards in its business and operational practices. LGH is committed to full compliance with all Federal and State laws, regulations and programs.

All LGH employees have a duty to conduct themselves in a manner that reflects the highest ethical standards and are required to follow all Compliance policies and procedures and the Code of Conduct. Suspected violations of the Code of Conduct or policies relating to Compliance shall be addressed immediately. Failure to comply or report noncompliance with all Federal health care program requirements and LGH's policies will result in appropriate disciplinary action as stated in this Code of Conduct and/or the LGH Disciplinary Policy (Administrative Policy V-D3).

VISION

Be a regional healthcare system that always delivers excellence.

MISSION

To Restore, Maintain & Improve Health.

COMPLIANCE CODE OF CONDUCT



❖ RESPONSIBLE PARTIES

All administrators, trustees, officers, directors, managers, employees, active medical staff members, contractors, volunteers, students and others are informed of this Code of Conduct and sign an Affirmation Statement indicating their adherence to the Code of Conduct. However, this Code of Conduct does not replace sound ethical and professional judgment.

❖ PURPOSE

The purpose of the Code of Conduct is to serve as a guide, outlining the necessary and acceptable behaviors required to create an ethical culture of safety, respect, courtesy and compassion for all responsible parties while in the workplace. These behaviors ensure an environment that allows Lafayette General Health (LGH) to carry out its mission and vision.

Ethical conduct simply means, *“Doing the Right Thing.”*

❖ STANDARDS

All LGH employees and its affiliated professionals, while carrying out their daily jobs and duties, will follow the following standards presented in this brochure.

❖ COMPLIANCE WITH LAWS AND REGULATIONS

1. LGH employees and affiliates will obey and follow all applicable federal, state and local laws and regulations.
2. LGH and its employees will maintain high standards of business and ethical conduct in accordance with applicable federal, state and local laws and regulations including fraud, waste and abuse.
3. The failure of any LGH employee to comply with or report noncompliance with any or all Federal health care programs’ requirements and LGH’s policies will result in an immediate investigation and may include disciplinary action up to and including termination.

❖ BILLING, CODING AND COST REPORTS

1. LGH is committed to submitting accurate, consistent claims with all Federal health care programs.
2. LGH is committed to honesty, accuracy and integrity in all of our billing, coding and documentation activities.
3. LGH will comply with Federal and State laws relating to all cost reports. These laws and regulations define what costs are allowable and outline the appropriate methodologies to claim reimbursement for the cost of services provided to the programs’ beneficiaries.

❖ CONFLICTS OF INTEREST

A conflict of interest may occur if your outside activities or personal interests influence or appear to influence your ability to make objective decisions in the course of your job responsibilities. A conflict of interest

may also exist if the demands of any outside activities hinder or distract you from the performance of your job or cause you to use LGH resources for other than LGH purposes. It is your obligation to ensure that you remain free of conflicts of interest in the performance of your responsibilities at LGH. If you have any questions about whether an outside activity might constitute a conflict of interest, you must obtain the approval of your supervisor before pursuing the activity.

❖ QUALITY OF CARE

LGH is committed to providing the highest quality of care and delivering services in an ethical, professional and cost-effective manner.

❖ ENSURING PATIENT RIGHTS

1. LGH treats all patients with respect and dignity and provides care that is both necessary and appropriate.
2. Patients are treated in a manner that preserves their dignity, autonomy, self-esteem, civil rights and involvement in their own care.
3. We assure patients’ involvement in all aspects of their care and obtain informed consent for treatment.
4. Patients are informed of their right to develop and enforce their specific advance directives. Patient advance directives will be honored by LGH within the limits of the law and the organization’s mission and capabilities.
5. LGH protects the integrity of clinical decision-making processes, regardless of how the hospital compensates or shares financial risk, with its leaders, managers, clinical staff and licensed independent practitioners.
6. Patients and their representatives will be assured appropriate confidentiality, privacy, security and protective services, opportunity for resolution of complaints and pastoral counseling.

❖ PROTECTION OF PROPERTY

LGH is committed to protecting our assets and the property of patients, employees and visitors against loss, theft and misuse.

❖ HUMAN RESOURCES

1. LGH is committed to providing an environment that protects and supports all employees, as well as helping them to achieve their fullest potential in a fair and equitable manner.
2. Any behavior that disrupts the operation of the hospital, affects the ability of others to do their jobs or creates a hostile work environment is considered unacceptable and disruptive.
3. Employees are directed and encouraged to follow the Chain of Command with all HR issues. If the employee does not feel comfortable with following the LGH Chain of Command, they may speak directly with the Director of Human Resources, the Chief Compliance Officer or their Vice President.

❖ EXPECTATIONS

1. All LGH employees will be expected to report any charging, billing or coding noncompliance or suspected violations of any Federal health care program requirement to the Compliance Officer or the designated Compliance Line (1-877-547-2633).
2. Practice good faith in transactions occurring during the course of business.
3. Refuse any illegal offers, solicitations, payments or other remuneration to induce referrals of the people we serve for an item of service reimbursable by the third party.
4. Deal openly and honestly with fellow employees, customers, contractors, government entities and others.
5. Preserve patient confidentiality unless there is written permission to divulge information, except as required by law.
6. Hold vendors to the same Code of Conduct as part of their dealings with LGH.
7. Use the Chain of Command to notify the appropriate supervisors, managers, directors or administration of any human resources concerns.
8. Ensure compliance requirements regarding coding and billing are monitored and enforced regardless of the payer source.
9. Use supplies and services in a manner that avoids waste.
10. Protect and retain records and documents as required by professional standards, governmental regulations and organizational policies.

CONFIDENTIAL DISCLOSURE AND NON-RETALIATION WITH RESPECT TO DISCLOSURES

LGH has established a Confidential Disclosure Program which allows reporting of any issues or questions associated with LGH’s policies, practices or procedures with respect to all Federal health care programs believed by the individual to be a potential violation of criminal, civil or administrative law. LGH is committed to maintain confidentiality, as appropriate, with all employees, and non-retaliation with respect to disclosures.