

CRAIG HOSPITAL POLICY/PROCEDURE	
Approved: CC, DD 09/06; MEC,BOD, P&P 10/06; CC, P&P 03/08 DD, MEC, 12/08; BOD, P&P 01/09; CC, P&P 01/12, CC 06/12, P&P 07/12, 07/15; CC, P&P 01/17	Effective Date: 04/01
Attachments: None	Revised Date: 06/04, 09/06, 03/08, 12/08, 06/12, 07/15, 01/17
Forms: None	Reviewed Date: 01/12

SUBJECT: CODE OF CONDUCT

RATIONALE: Craig Hospital will conduct all business ethically and legally, according to the Code of Conduct.

SCOPE: All Employees, Medical Staff

DEFINITIONS: Mission: To advocate for and provide exemplary rehabilitation care to people affected by spinal cord and traumatic brain injury so that they can achieve optimal health, independence, and life quality.

Core Values

1. Foster independence through education and experiences
2. Encourage peer support
3. Develop a family atmosphere where caring for others is shared
4. Embrace a culture of safety
5. Put fun into the process of rehabilitation
6. Advance rehabilitation through research
7. Promote life quality through advocacy and education

Vision: Craig Hospital will be recognized internationally as a leader in providing innovative rehabilitation and healthcare services through an interdisciplinary team approach focused on delivering exception life quality and independence outcomes for people affected by spinal cord and traumatic brain injury.

POLICY: The Code of Conduct at Craig Hospital provides guidance to all employees and medical staff to ensure work is done in an ethical and legal manner. It reflects Craig’s commitment to providing quality care to patients and families. The Code of Conduct incorporates the mission and values of the hospital, which is an

integral part of the caring environment for patients, families and staff.

Although the Code provides guidance, it is not a substitute for an individual's sense of honesty, fairness and integrity. Therefore, if at any time an employee is faced with a situation which may be correct under the Code, but believe that the course of action or outcome just "doesn't feel right," the situation should be discussed with a supervisor, department director or Craig's Compliance Officer. If Craig follows these guidelines, the hospital will continue to be an international leader in the provision of care for individuals with traumatic spinal cord and brain injury, and the Craig environment will continue to foster respect, trust and fairness in all interactions.

PROCEDURES:

I. Patient Care and Rights

Craig is committed to providing high quality, cost-effective healthcare to all our patients. Our patients have a right to considerate and respectful care and a right to be well informed about all aspects of their care and treatment. Upon admission, each patient is provided with a copy of the patient rights and responsibilities (*RI 29*) and the Notice of Privacy Practices (*PR 19*). Craig's adherence to patient rights is an assurance that patients are treated in a manner that protects and preserves their dignity, self-esteem, legal rights, autonomy, and involvement in their own care.

No staff shall release or discuss patient health information (PHI) with others unless authorized by the patient and in the interest of serving the patient or as required by law. Craig is committed to maintaining patient privacy and the confidentiality of PHI.

II. Fraud and Abuse

State and federal laws provide specific civil and criminal sanctions against fraud and abuse in hospitals. For example, filing false claims, using the wrong billing codes, providing unnecessary services, or paying for patient referrals may be fraud or abuse and Craig is committed to avoid any fraud or abuse in the hospital. The hospital wants to make certain that all services provided to patients are necessary, that they are correctly documented, and the billing/coding is accurate.

Craig arranges for all financial and business relationships properly. The hospital will report all costs under generally accepted accounting principles. Any employee, who knows or has reason to believe that a transaction has not been properly recorded, should promptly report this to Craig's Corporate Compliance Officer. No employee shall engage either directly or indirectly in any corrupt business practice, including bribery, kickbacks or pay-off. An employee should never intentionally submit a claim, a charge, or bill for services that the employee suspects is false. An employee should never falsely certify that a service was medically necessary.

An employee, who has a reason to believe that false documentation may exist, should report the concern to their supervisor, department director or Craig's

Compliance Officer. If further resolution is needed, the employee may also report to the President of the Hospital, the Chair of the Finance Committee of the Board of Directors, the Chair of the Board of Directors, or the Office of the Inspector General of the Department of Health and Human Services. **An Ethics and Compliance hotline is available for anonymous and confidential reporting at 800-398-1496.**

III. Record Keeping

Like all hospitals, Craig has health records which it is required to maintain. For all records, an employee is expected to preserve patient confidentiality and never falsify facts or make false records. Craig maintains a policy for all destruction procedures of relevant records. The hospital disposes of records as permitted by law, business necessity and applicable policies and procedures.

IV. Open and Honest Communication

Craig promotes a work environment that allows each employee to be open and honest in his/her business relationship with other staff members. The hospital tries to create a workplace where employees are free to discuss their concerns about any issues. Supervisors help team members define proper behavior and the Human Resources Director, Compliance Officer, Department Directors, Vice Presidents and the President are available to help resolve issues.

- A. Desirable and acceptable behaviors promote collegiality and collaboration, with open, honest communication. The hospital supports working in teams and respecting others, regardless of their position in the organization.
- B. Undesirable, disruptive and inappropriate behaviors, such as (but not limited to) the use of rude language, threatening manners, intimidation, yelling or physical abuse are not tolerated. These behaviors listed or any other behaviors that undermine a culture of safety will be addressed through the *HR 16 Conflict Resolution*, *RI 23 Violence in the Workplace* and *MS 12 Impaired Practitioner/Disruptive Behaviors* policies.
- C. Employees reporting undesirable, disruptive and/or inappropriate behaviors have the right to speak out without fear of disciplinary action, retaliation or loss of employment.

V. Conflict Resolution

Specific steps for the conflict resolution process are outlined in *HR 16 Conflict Resolution*. The policy includes the following steps:

- A. Meeting with involved parties as early as possible to identify the conflict.
- B. Gathering information regarding the conflict.
- C. Working with the parties to address, and when possible, resolve the conflict.
- D. Actively working toward conflict resolution and encouraging a culture of safety and quality of care.

VI. License and Certification Renewals

All physicians and employees who require professional license certification or other credentials are responsible for maintaining the current status of their credentials. To insure compliance, Craig will require evidence of current licensure or credential status.

VII. Acceptance of Gifts/Entertainment

No employee or any member of any employee's immediate family may accept any personal gift (including complimentary, business or personal trips) from any of Craig's competitors, patients, suppliers or other providers, or any with which that employee does business with on behalf of Craig. Cash or gift cards in any amount are not to be accepted. However, acceptance of an occasional and nominal gift or meal with a value less than \$50 will not be considered a violation of this principle.

VIII. Personal Benefit

No employee should become involved in any manner with competitors, contractors, patients or suppliers of the hospital if such involvement would result in improper personal gain. An employee is not prohibited from purchasing goods or services from a customer or supplier if those goods or services are purchased on terms generally available to non-employees of Craig.

IX. Conflict of Interest

A conflict of interest exists whenever an employee, or a member of their immediate family, has an interest of a direct or indirect nature in any entity dealing with or in competition with Craig, and the interest is of such a nature that his/her decision regarding Craig's policy or Craig matters may be affected by it. All employees are required to report to Administration any conflict of interest situation. Administration will determine when a conflict of interest exists and take whatever action necessary to solve problems. (See *RI 18 Conflict of Interest* which provides guidelines concerning specific practices.)

X. Marketing and Advertising

Craig uses marketing and advertising activities to educate the public, increase the awareness of our services and to recruit colleagues. Craig will present only truthful and non-deceptive information in advertising materials. An employee should never offer any information to the public which is not factual.

XI. Employee Disclosure Obligations

An employee who acquires information or has knowledge of facts indicating a violation or potential violation of Craig's Code of Conduct must disclose the matter directly to his/her supervisor, department director or Administration. If the employee believes a disclosure to such a person has not resulted, or will not result, in a timely and appropriate disposition of the matter, the employee should disclose the matter directly to the Compliance Officer. Suspected violations may also be reported directly to the President of the Hospital, the Chair of the Finance Committee of the Board, the Chairman of the Board of Directors, or the Office of the Inspector General of the Department of Health and Human Services.

XII. Violations of the Code of Conduct

Violations of the Code of Conduct or company policy may lead to disciplinary action including termination. Craig expects all team members to follow Craig policies and the Code of Conduct and to report violations.

XIII. Non-Retaliation

Craig Hospital will refrain from intimidating, threatening, coercing, discriminating against, or taking any other retaliatory action against any employee, patient, or other individual for exercising rights provided by the Privacy Rule, for assisting in an investigation by HHS or another appropriate authority, or for opposing an act or practice that the person believes in good faith violates the Privacy Rule.