

Subject:  <b>ORGANIZATIONAL ETHICS STATEMENT</b>	Dept: Administration	Page 1 of 5
Applies to: All Medical Center Personnel	Prepared by/Title: Joyce Schaefer, Administrator Patient Care Services  Approved by/Title: M. Karuschak, CEO: Medical Staff:           Governing Board: Joyce Schaefer, Administrator Patient Care Services:	Effective: 3/96 Reviewed/ Revised:7/97 11/97, 2/99,9/01 12/02,12/03, 12/04, 1/07,10/10

The Governing Board of Amery Regional Medical Center has established this statement of organizational ethics in recognition of the institution's responsibility to our patients, staff, physicians/providers and the community we serve. It is the responsibility of every member of the Amery Regional Medical Center community - governing board members, administration, medical staff members, employees - to act in a manner that is consistent with this organizational statement and its supporting policies.

Each supervisor and manager is responsible for ensuring that the personnel within their supervision are acting ethically and in compliance with applicable law and the organizational ethics statement. All personnel are responsible for acquiring sufficient knowledge to recognize potential compliance issues applicable to their duties and for appropriately seeking advice regarding such issues.

Our behavior will be guided by the following general principles:  
 A dedication to the principle that all patients, employees, providers and visitors deserve to be treated with dignity, respect and courtesy. We will constantly strive to adhere to these principles:

- A. To treat all individuals fairly.
- B. To provide a quality working environment for our employees and physicians/providers.
- C. To build cooperative working relationships with other healthcare organizations.
- D. To listen to our customers.
- E. To continue to improve our services.
- F. To operate our Medical Center in full compliance with applicable laws.

In all of the various settings in which this organization provides patient services, we will consistently follow well-designed standards of care based upon the needs of the patient and without regard to their ability to pay for services.

We will provide services to those patients whom we can safely care for within this organization and if it is determined we do not have the resources to care for the patient, we will make the necessary transfer to the appropriate facility. We will not turn patients away who are in need of our services based on their ability to pay or based upon any other factor that is substantially unrelated to patient care.

We will strive to provide care that is of comparable quality regardless of the setting in which that care is provided.

### Respect for the Patient

We will treat all patients with dignity, respect and courtesy. These patients (or their significant others) will be involved in decisions regarding the care that we deliver to the extent that such is practical and

possible. We will also seek to inform all patients about the therapeutic alternatives and the risks associated with the care they are seeking. We will constantly seek to understand and respect their objectives for care.

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In all circumstances, we will attempt to treat patients in a manner giving reasonable thought to their background, culture, religion and heritage.

### **Admission/Discharge/Transfers**

The Medical Center will serve patients regardless of financial status so long as we have the medical capability to do so. Accordingly, no patient seeking treatment will be denied such treatment. No patient will be discharged except when medical criteria support such discharge. No patient will be transferred to another facility unless medically necessary. If the patient requests a transfer and such transfer creates no undue medical risk, a transfer may be accomplished with full consent of the recipient facility, recipient medical providers, and the patient. All transfers shall have documentation which complies with Federal statutes regarding transfers. No ambulance or other conveyance shall be diverted from bringing a patient to the Medical Center unless we have no capacity to provide necessary care and such diversion contributes to public health and safety.

### **Resolution of Conflicts**

We recognize that from time to time conflicts will arise among those who participate in Medical Center and patient care decisions. Whether this conflict is between members of administration, medical staff, employees, or the governing board of this institution, or between patient caregivers and the patient, we will seek to resolve all conflicts fairly and objectively. In cases where mutual satisfaction cannot be achieved, it is the policy of this board to involve the CEO to oversee resolution of the conflict. Other staff and second opinions will be involved as needed to pursue a mutually satisfactory resolution.

### **Conflicts of Interest in Contractual Relationships**

Personnel authorized to enter into contracts or approve other contractual or Medical Center relationships agree to disclose any actual or potential conflict of interest. Board members, Administration, Medical Staff, Directors, Coordinators, and exempt or non-exempt employees are required to submit an annual disclosure form to disclose potential conflicts related to decisions that arise during the course of a year. The Governing Board, as well as Senior Management and Medical Staff will review all potential conflicts when appropriate and take appropriate action. Board members should abstain from votes on an issue when there is a potential conflict of interest. In the event a potential conflict of interest has a direct implication for patient care, the institution may convene the Ethics Committee to assist in resolution of the issue.

Medical Center employees and departments shall not offer or give any bribe, payment, gift or anything of value to any person or entity whom ARMC has or is seeking to do business or regulatory relationship excepts of a nominal value which are legal and given in the ordinary course of business.

Personnel shall not directly or indirectly authorize, pay, promise, deliver or solicit any payment, gratuity or favor for the purpose of influencing any political official or government employee in the discharge of that person's responsibilities.

Other than compensation from ARMC, and as consistent with the conflict of interest policies, personnel shall not have a financial or other personal interest in a transaction between ARMC or any of its business units and a vendor, supplier, provider or customer.

Personnel shall not engage in any financial, business or other activity which competes with the ARMC

business which may interfere or appear to interfere with the performance of their duties or that involve the use of ARMC property, facilities or resources, except to the extent consistent with the conflict of interest policies.

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The Medical Center will be a prudent purchaser and will seek competitive quotes whenever appropriate prior to awarding a contract or business. We will participate in collective purchasing organizations to further this goal. When no competitive bid is requested, our choice for contracting must meet the following standards: no conflicts of interest, no unwarranted favoritism, and full disclosure to the Governing Board.

Personnel shall comply with applicable antitrust laws. There shall be no discussions or agreements with competitors regarding price or other terms for product sales, prices paid to suppliers or providers, dividing up customers or geographic markets, or joint action to boycott or coerce certain customers, suppliers or providers.

The Purchasing Department or any other employee will not contract for services or supplies with employees or their family members without prior administrative approval.

Contracts with other providers of services define the conditions of participation binding on each of the parties.

#### **Billing**

The Medical Center will invoice patients or third parties only for services actually provided to patients and will provide assistance to patients seeking to understand the cost relative to their care. We will also attempt to resolve questions and objections to the satisfaction of the patient while considering the institution's best interest as well. Contracting for discounts will be allowed subject to oversight by the Governing Board. All collection efforts must be consistent and will strive to balance the service image of the Medical Center with the business prudence required to achieve financial goals.

#### **Discrimination**

All personnel are responsible for ensuring that the work environment is free of discrimination or harassment due to age, race, gender, color, religion, national origin, disability, sexual orientation, or covered veteran status. Any form of sexual harassment, including the reaction of hostile working environment, is completely prohibited.

#### **Confidentiality**

The organization recognizes the extreme need to maintain patient and other information in a confidential manner. As such, patient information will not be shared in an unauthorized manner and sensitive information concerning personnel and management issues will be maintained in the strictest confidence and utilized only by those individuals authorized to review and act upon such information.

Underlying each of the above principles is the organization's overall commitment to act with integrity in all of our activities and to treat the organization's employees, patients, physicians/providers and the many customers we serve with utmost respect.

#### **Political Activities**

All political activities relating to ARMC shall be conducted in full compliance with applicable law, No ARMC funds or property shall be used for any political contribution or purpose. Personnel may make direct contributions of their own money to political candidates and activities.

## **Marketing and Public Relations**

The behavior of the Medical Center is highlighted by our public speech. Accordingly, all public statements in whatever form will be accurate, conveying our services in a responsible manner and will not seek to solicit patient's for services beyond our capabilities.

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### **Reporting Violations**

Illegal acts or improper conduct may subject ARMC to severe civil and criminal penalties, including large fines and being barred from certain types of business. It is, therefore, very important that any illegal activity or violations of the organizational ethics statement be promptly brought to ARMC's attention. In many cases, if ARMC discovers and reports illegal acts to the appropriate governmental authorities, ARMC may be subject to lesser penalties.

Any director, officer or employee who believes or becomes aware of any violation of this ethics statement or any illegal activity by a director, officer or employee or another person acting on ARMC's behalf shall promptly report the violation or illegal activity in person, by phone or in writing to one of the following persons:

- a. Compliance Officer
- b. Direct Supervisor
- c. CEO
- d. Compliance Hotline

It is a violation of this ethics statement for personnel not to report a violation of any illegal activity. If you have a question about whether particular acts or conduct may be illegal or violate the ethics statement, you should contact one of the persons listed above. It is a violation for personnel to whom a potential illegal act or violation of the ethics statement is reported to not ensure that the illegal act or violation of it comes to the attention of those responsible for investigating such reports.

It is ARMC's policy to promptly and thoroughly investigate reports of illegal activity or violations of this ethics statement. Personnel must cooperate with these investigations. You must not take any actions to prevent, hinder or delay discovery and full investigation of illegal acts or violations of this statement. It is a violation of this ethics statement for personnel to prevent, hinder or delay discovery and full investigation of illegal acts or violations of this statement.

Personnel may report illegal acts or violation of the ethics statement anonymously. To the extent permitted by law, ARMC will take reasonable precautions to maintain the confidentiality of those individuals who report illegal activity or violations of this statement and of those individuals involved in the alleged improper activity, whether or not it turns out that the improper acts occurred. Failure to abide by this confidentiality obligation is a violation of this ethics statement.

No reprisals or disciplinary action will be taken or permitted against personnel for good faith reporting of, or cooperating in the investigation of, illegal acts or violations of this ethics statement. It is a violation for personnel to punish or conduct reprisals in regard to personnel who have made a good faith report of, or cooperated in the investigation of, illegal acts or violation of this statement.

Personnel who violate the ethics statement or commit illegal acts are subject to discipline up to and including dismissal. Personnel who report their own illegal acts or improper conduct, however, will have self-reporting taken into account in determining the appropriate disciplinary action.

**Related Policies**

The following related policies and procedures provide further and specific guidance for ethical conduct at Amery Regional Medical Center:

Mission Statement

Vision Statement

Plan for Nursing Care of Patients

Patient Admission Policy

Patient Rights and Responsibilities Statement

Informed Consent

Exclusion From Patient Care Policy

Grievance Policy

Medical Ethics Policy

Policy on Sexual Harassment

Policy on DNR

Advance Directives Policy

Confidentiality/Release of Patient Information Policy

Patient Transfer Policy

Discharge Planning Services

Marketing Plan

Organ/Tissue Donation Policy

ARMC Legal Compliance Program

ARMC Financial Policy

Financial Assistance Policy