



West Calcasieu Cameron Hospital

## CODE OF CONDUCT

### **Purpose**

To establish and administer a written code of conduct and ethics for all employees and associated providers with the specific intent of identifying and correcting actions that may be considered fraudulent or abusive

### **Policy**

It is the policy of West Calcasieu Cameron Hospital (WCCH) that all its directors, officers, and employees perform their duties and responsibilities in an objective and impartial manner that promotes honest and ethical conduct, compliance with applicable laws, rules, and regulations, accountability for adherence to the code, and prompt internal reporting of violations of the code to appropriate persons identified in the code.

The WCCH Code of Conduct and Ethics is reasonably designed to aid those associated with WCCH in the realization of the highest standards of integrity and quality of service to our patients. The leadership of West Calcasieu Cameron Hospital is dedicated to compliance with the laws, regulations, and requirements of federal, state and private payer plans with which we work, as well as the highest standards of professional responsibility. We adhere to the principles that patients are to be treated with respect and dignity; that the patient has the right to determine his or her choice of providers and institutions; and that all patients are to be equally and fairly treated in the provision of care.

Payments and Discounts: The receipt of payment, discounts, or gifts that may be considered 'remuneration' for referral of patients is strictly prohibited. The payment of or receipt of such 'remuneration' is barred by law for the purchase, lease, ordering, or recommending any goods, facilities, services, or items.

Kickbacks: Any payment or receipt of payments that can be considered 'kickbacks' for the use or recommendation of supplies, services, goods, facilities, or items is prohibited. This includes knowingly or willfully offering, paying, asking, or receiving money or other benefits, directly or indirectly, in return for favorable terms or treatment.

Loans and Rebates: The offer or delivery of loans, rebates, or services, or payment of any kind, in any way connected to patient referrals, is prohibited.

Entertainment: Business dealings may include a shared meal or similar social occasion, which may be proper business expense or activity. More extensive entertainment will only rarely be consistent with organizational policy and should be reviewed and approved by the Corporate Integrity Officer and/or legal counsel.

Gifts: Employees of West Calcasieu Cameron Hospital may not receive any gift under circumstances that could be considered an attempt to influence decisions or actions. Gifts received in a manner that construes an attempt to influence should be returned and the incident reported to the Corporate

Integrity Officer. Token promotional items such as key chains, pens, or pencils marked with the donor's name are not considered gifts when provided in individual or limited quantities.

Billing: West Calcasieu Cameron Hospital bears a great responsibility to the public to accurately bill for actual services rendered in a timely manner. Those dealing with billing and claims are expected to maintain the highest standard of integrity, honesty, and diligence in the performance of these important duties. West Calcasieu Cameron Hospital is committed to 100% accuracy in our financial dealings. False, inaccurate, or questionable claims, coding or billing should be reported immediately to the billing supervisor or Corporate Integrity Officer. Examples of practices that may be considered fraudulent or abusive include:

- Claiming reimbursement for services that were not rendered
- Filing duplicate claims
- Upcoding to more complex procedures than were actually performed
- Falsely indicating a provider attended a procedure
- Billing for services not medically necessary
- Billing for an inappropriate length of stay
- Failing to provide medically necessary items or services
- Billing excessive charges
- Making inaccurate or false claims on Cost Reports

Patient's Freedom of Choice: West Calcasieu Cameron Hospital is in the business of providing the delivery of appropriate health care services. Patients served by West Calcasieu Cameron Hospital may be referred to other organizations or providers as medically necessary for the treatment of their condition. The patient should make the choice of providers, with guidance from his or her physician as to which providers are qualified and medically appropriate.

Referrals to or from West Calcasieu Cameron Hospital by providers who have a financial relationship with West Calcasieu Cameron Hospital may only be made if specific provisions of law (Stark and Safe Harbor Provisions) are met. Any referral or pattern of referral that is questionable should be brought to the attention of the Corporate Integrity Officer, who is obligated to review that action with the advice of West Calcasieu Cameron Hospital's legal counsel.

Use of Company Property: Property owned by West Calcasieu Cameron Hospital should be used for business purposes only, and should not be used for personal benefit. This includes owned, rented, or leased property, equipment, vehicles, supplies, computer systems or software, office supplies, facilities, services, or any other forms of property. The assets of individuals or companies with which we do business, while in our care or use, should be treated with the same respect as property owned by West Calcasieu Cameron Hospital.

Reporting Abuse: It is the responsibility of each employee of West Calcasieu Cameron Hospital to attempt to recognize fraudulent or abusive occurrences or situations and to report them promptly to their supervisors, West Calcasieu Cameron Hospital's Compliance Hotline, or other resources as necessary. Failure to report potential violations is a separate violation.

Retaliation or Retribution: Retaliation or retribution of any kind on the part of managers, co-workers, or employees against those reporting fraudulent or abusive activity or the possibility of fraudulent or abusive activity will not be tolerated. Employees who feel they are the target of retaliation or retribution should report immediately to their supervisor; follow grievance procedures in West Calcasieu Cameron

Hospital's Personnel Policy and Procedure Manual; and/or contact the Compliance Hotline to file a formal report that will be forwarded to the Corporate Integrity Officer and/or Administration.

The officers and managers are responsible for ensuring that all employees they supervise understand the importance of compliance. Through ongoing education and training, all employees will be made aware of provisions of compliance and the procedures for reporting questionable practices and are protected from retaliation if they come forward with information.

West Calcasieu Cameron Hospital expects all of its employees to conform to the highest ethical standards and to avoid even the appearance of unlawful conduct. It is the intent of West Calcasieu Cameron Hospital to uphold the integrity required as a participant in federally funded healthcare programs, applicable laws and regulations as well as participation in the private health plans of our patients.

Reference:

<https://www.ecfr.gov>. Title-12/Chapter-XII/Subchapter-B/Part-1239/Subpart-C/Section-1239.10