

 Home Care	UR Medicine Home Care, Inc.	<input checked="" type="checkbox"/> URMHC Certified Services, Inc. <input checked="" type="checkbox"/> UR Medicine Hospice <input checked="" type="checkbox"/> Signature Care <input checked="" type="checkbox"/> Finger Lakes Home Care <input checked="" type="checkbox"/> URMHC Community Services, Inc.
	POLICY: Standards of Conduct	SCOPE: Agency
	SECTION: 100-Administration	Policy #115
	Created: 9/1/98	Reviewed: 1/2021 Revised: 6/2016
	Approved by: Professional Advisory Committee (PAC) 2/11/2021	Regulation:

Policy: UR Medicine Home Care (The Agency) is committed to compliance with all applicable laws and the prevention of illegal or improper acts in the delivery of services. To that end, specific corporate compliance standards have been adopted and included in the Standards of Conduct. The Standards of Conduct sets forth an institutional philosophy and values concerning compliance with the law, with government guidelines, and with ethical standards. The Standards of Conduct also include a summary of laws designed to prevent fraud, waste and abuse in the submission of claims, the making of patient referrals, conflicts of interest, and the acceptance of remuneration for services provided.

Description: UR Medicine Home Care exists to preserve quality of life and independence by providing community-based, coordinated, and patient and family-centered care and services. The Agency believes that dedication to high ethical standards and compliance with all applicable laws and regulations is essential to its mission. The ICARE values: Integrity, Compassion, Accountability, Respect, and Excellence are the common standards that drive our priorities, partnerships and decisions..

The Standards of Conduct are a practical extension of our Core Values. They more fully articulate expectations for how employees should conduct themselves to promote and protect the integrity of the agency. The Agency expects its employees and agents to conduct the business affairs in a manner consistent with the following Standards of Conduct, in addition to all Policies and Procedures of the Agency:

- **Conduct all activities in compliance with applicable laws and regulations.** The Agency is committed to full compliance with all Federal health care program requirements. These laws pertain to such areas as abuse, antitrust, employment discrimination, environmental fraud, false claims, lobbying and political activity, self-referral prohibitions and tax.
- **Promote the highest standards of business ethics and integrity.** Employees must represent the Agency accurately and honestly and must not engage in any activity intended to defraud anyone of money, property or services. Employees must act in good faith and in the best interest of the Agency.

This includes both patient care and providing care to immediate family members. All employees are expected to abide by all applicable regulations which impact patient care activities (i.e., clinical practice standards, patient eligibility criteria and documentation standards.) The medical treatment typically requiring the attention of a licensed health care professional requires objectivity when assessing patients and making clinical decisions. To support this principle, The Agency's employed, contracted, and/or credentialed providers and staff shall not provide care that would typically be provided by a licensed clinical professional or paraprofessional to themselves or immediate family members except in an emergency situation requiring immediate professional attention or an isolated setting where there is no other qualified provider available. If such care is provided, the provider must promptly notify their supervisor. For this purpose, family member includes a spouse, domestic partner, parent, child, and sister or brother, and a spouse of any such individual.

- **Staff Responsible for the charging, coding, billing, documentation and accounting of patient care services must comply with all applicable state and federal regulations and specific policies and procedures.** It is against the law and Agency policies to knowingly or carelessly submit a false claim. Submitting a false claim includes using the wrong code, falsifying records, or billing services that are not provided or fully documented or are not medically necessary.
- **Maintain the confidentiality of patient information and protect confidential and proprietary information about employees and about The Agency.** All patient information (including paper and electronic medical records) must be kept confidential and not released to anyone, except the treating providers, without the patient's written consent or court order. All personnel must avoid discussing confidential medical or business related information with outsiders, or where others might overhear them. The minimum necessary rule should be applied and therefore only the minimum amount of information should be disclosed.
- **Conduct activities and relationships with others so as to avoid actual conflicts of interest, in appearance or fact.** This means that an employee should not personally benefit from doing business with the Agency, should not have independent relationships with those who deal with the Agency, should not use Agency property for their personal benefit and should not compete with the Agency. If an employee has a potential conflict, they must make full disclosure and take appropriate action with the Corporate Compliance Officer and the members of the Administrative Team. In addition this means employees who are members of the Communications Group may not

work for a competitor, Paraprofessional employees whose role is in direct patient care may work for a competitor agency and all other employees must receive approval from the VP of Human Resources.

- **Conduct all clinical activities and business transactions in a manner that avoids the receipt of payment or anything of value in exchange for referrals of business or specifically, the referral of patients.** Employees should never offer or receive any item of value or service that may be viewed as a bribe, kickback, or inducement for the referral of patients or business to the Agency. Employees can accept gifts of nominal value from suppliers or vendors and to the extent possible, they should be shared with co-workers and approved by the Corporate Compliance Officer. This includes the following:
 - A. **Cash gifts or gratuities:** Under no circumstances may an employee or family member of an employee accept a cash gift or gratuity from a client, a family member or friend of a client, or a vendor or potential vendor. Any employee that gives or accepts such a cash gift or gratuity will be subject to disciplinary action.
 - B. **Non-monetary gifts:** On occasion, employees, patients, and others may wish to give Agency employees personal gifts such as flowers, food, homemade items or small tokens of appreciation or recognition. Employees may accept these occasional, token gifts as long as the gift is of a nominal value (under \$25 in value). However, even gifts of nominal value may not be accepted from vendors or sales representatives. Employees may not give business or personal gifts to vendors, outside providers or suppliers. **See policy #114A**
- **Report to the Compliance Officer or Fraud Compliance Hotline any suspected violations of any Federal Health Care program requirement, or Agency policy or procedure, or any suspected instances of Fraud, Abuse, or Waste.** The Agency is committed to maintain confidentiality and non-retaliation with respect to such disclosures. It is the expectation and obligation of each employee to disclose violations of policy.