



CODE OF CONDUCT

The employee will be asked to sign a company Code of Conduct page acknowledging that they have read and understand the content of this document.

Mission Statement

Calvert Hospice's mission is to provide comprehensive, interdisciplinary services focused on medical care and psychosocial, emotional, and spiritual support to residents of Calvert County who are dying; to promote and support the provision of palliative care to those in need; to provide emotional, psychosocial and spiritual support to those in Calvert County grieving the loss of a loved one; and to provide educational services to the entire community about the processes that accompany death and loss.

Vision

Calvert Hospice serves as a center of excellence and expertise in death, dying, grief and bereavement, providing direct services and education to support and assist the community as it encounters these profound life experiences.

To achieve this broad vision, the organization is committed to maintaining itself as a viable entity, meeting its mission to the community and facing future challenges with confidence and determination.

Purpose

The Calvert Hospice Code of Conduct incorporates ethical standards for individual and organization behavior adopted by the employees of Calvert Hospice. The Code of Conduct helps ensure that work is performed in an honest, responsible, ethical, and legal manner. This Code promotes integrity, supports objectivity, and it fosters trust.

The Code of Conduct intends to provide guidance to all employees, managers, members of the medical and professional staff, volunteers, and contract service providers. It is expected that in all situations, services will be provided, and relationships maintained, in accordance with the core ethical values which form the foundation of Calvert Hospice's mission.

Organization Core Values:

Leadership –

We are leaders in the health care community, at the forefront of issues of importance to our team, our patients and their families, our clients and the community.

Stewardship –

We use our resources wisely, capitalize on the strengths of our team and manage our financial affairs responsibly.

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Staff Support –

We promote a stable environment conducive to the team's growth and excellence. We support scholarship and education to help us meet our mission.

Innovation –

We seek to identify, explore, and implement new ideas to help us meet our mission.

Advocacy –

We promote the hospice experience and philosophy in all that we do.

Overview

The Code of Conduct constitutes an expression of standards with respect to the most significant aspects of business ethics and legal compliance. Certain subjects are of such complexity that additional information and guidance may be necessary for those directly involved with that service. In such cases, departmental policies and procedures will serve to supplement this document. Each member of the Calvert Hospice staff has a responsibility to be aware of the legal requirement and restrictions applicable to their position and duties.

Leadership Responsibilities

Calvert Hospice Board Members will discharge their duties in good faith and with the diligence, care, and the skills of a prudent person. They are familiar with and make appropriate inquiries regarding business, operational, and service delivery matters in which Board judgments are sought, and have a responsibility to be informed regarding financial matters.

Leadership will serve as role models in establishing an environment that promotes the highest standard of ethics and compliance in the delivery of patient services and the pursuit of business objectives. Leadership will ensure that employees are provided with the information necessary to comply with applicable laws, regulations, and organizational policies and to encourage the raising of concerns in a timely and constructive manner.

Key Relationships

Patients

Calvert Hospice employees will treat all individuals with respect and dignity.

Services will be provided, in compliance with Title VI of the Civil Rights Act of 1964, without regard to patient's race, color, national origin, disability, age, gender, religion, or any other classification protected by law.

Only a qualified employee will provide services.

Services provided will be both necessary and appropriate.

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A statement of patient rights and responsibilities will be provided to patients. Patient rights include the right to make decisions regarding medical care and to also be involved in all care provided.

Each patient, or his or her legal representative, will be provided with a clear statement defining the conditions for receiving services from Calvert Hospice.

Informed consent is obtained from the patient and/or authorized representative. An Informed Consent statement is an explanation of services to be provided.

Information about a patient's medical condition, history, medication, and family history is confidential and will not be released or discussed with others without consent or authorization from the patient or their legal representative unless necessary for legitimate business or patient care purposes.

Health Professionals

Calvert Hospice strives to maintain an environment of mutual respect, trust, and collaboration with community health professionals. All business arrangements with physicians or allied health professionals are structured to ensure compliance with legal requirements.

Patient referrals and admissions are based on the patient's need and Calvert Hospice's ability to render the required services. In no circumstance does Calvert Hospice pay for patient referrals, nor does it accept payment for referrals made to others.

Colleagues

Calvert Hospice employees will act accordingly to maintain an environment of mutual respect, trust, and collaboration with colleagues and management. Staff will uphold the highest levels of professionalism conforming to codes of professional conduct.

Third-Party Payors

Calvert Hospice will provide accurate, timely billing in accordance with applicable State and Federal laws and regulations, private insurer standards, and according to contractual terms, if any. Oversight systems are in place to verify the accuracy of all claims submitted for payment. Cost Reports are compiled in a manner consistent with Federal and State laws utilizing the appropriate methodologies.

Employee Credentials, Certification, and Licensure

Professional licenses, credentials, or certifications will be maintained by employees or independent contractors when necessary.

Contractors, Suppliers, and Vendors

Selection of subcontractors, suppliers, and vendors is made on the basis of objective criteria that include quality, technical excellence, price, service, and the ability to meet organizational needs.



Regulatory Agencies

Calvert Hospice employees will comply with all applicable State and Federal laws, regulations, statutes, standards, and other directives as they apply in the conduct of Calvert Hospice business. Requests for information, inquiries regarding billing, and other organizational policies and procedures are answered with complete, factual and accurate information.

Legal Compliance

Employees and managers are required to comply with all applicable laws whether or not they are specifically addressed in this Code of Conduct. Calvert Hospice does not knowingly employ or associate with individuals or entities who have been excluded from participation in Federal Health Care Programs (e.g. Medicare and Medicaid). If an employee has a question regarding the existence, interpretation, or application of any law, they should consult their Manager or the Compliance Officer. Employees must comply with Antitrust, Stark Act, Fraud and Abuse, False Claims, HIPAA, and Civil Rights legislation. Calvert Hospice complies with laws that mandate OIG compliance of staff and volunteers.

Business Practices

Employees will accurately and honestly represent Calvert Hospice and will not engage in any activity or scheme intended to defraud anyone of money, property, or honest services.

Workplace Conduct

Calvert Hospice employees are expected to meet performance standards for their position and to adhere to all reasonable standards and rules in their individual departments. Employees are expected to comply with Human Resource policies as defined in this Handbook and general organizational policies. Calvert Hospice requires honest communication from employees.

Employees should not be made to feel compelled to participate in fund-raising, or a similar effort, by a colleague.

Integrity and Confidentiality of Information

Every Calvert Hospice employee will actively protect and safeguard confidential, sensitive, proprietary, and patient information in a manner designed to prevent the unauthorized disclosure and use of that information.

All communication systems, including electronic mail, the Internet, social media, text messaging and voice mail are all property of Calvert Hospice and are to be used primarily for business purposes. Reasonable limited personal use of Calvert Hospice systems is permitted; however it should not be assumed that such use is private. Calvert Hospice reserves the right to monitor the information flow.

Employees and affiliates may not use internal communication channels or access the Internet at Calvert Hospice to post, store, transmit, download or distribute any threatening, maliciously false, or obscene materials, including anything constituting or encouraging a criminal offense, giving rise to civil liability or otherwise violating any laws. Neither may these channels of communication be used to send chain letters, broadcast personal messages, or distribute copyrighted documents that are not authorized for reproduction.

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Information includes documents and records (e.g. correspondence, memos, reports), computer-based information (e.g. email, electronic files, disks), and any other medium that contains information about Calvert Hospice. Information covered by this Code of Conduct may be clinical or non-clinical in nature. Information will be retained in accordance with applicable laws and Calvert Hospice's Record Retention Policy.

Calvert Hospice employees are required to protect electronically protected health information and other sensitive computerized data. Employees that use data, and the information derived from it, may only do so in the execution of official duties. Employees will not share computer passwords and understand authorized use of Calvert Hospice equipment and computer resources. Employees are required to report security-related incidents to their Manager as soon as they are identified.

Misappropriation of Proprietary Information

Calvert Hospice employees shall not provide Calvert Hospice's confidential or proprietary information to another person or entity nor utilize any publication, document, computer program, information, or product that would compromise Calvert Hospice's interest. All Calvert Hospice employees are responsible to ensure they do not improperly copy, for their own use, documents or computer programs in violation of applicable copyright laws or licensing agreements.

Human Resource Information

Salary, benefit, and other personal information relating to employees shall be treated as confidential and maintained in a manner designed to ensure confidentiality in accordance with applicable laws. Employees will exercise due care to prevent the release or sharing of information beyond those persons who may need such information to fulfill their job function.

Public Commentary

Requests for public commentary on behalf of Calvert Hospice should be directed to the Executive Director. Unless specifically authorized to do so, individuals should generally decline to provide public commentary on organizational matters.

Software

Unauthorized duplication of copyrighted computer software violates the law and will not be tolerated by Calvert Hospice's Standards of Conduct. Calvert Hospice disapproves of such copying and use of inappropriately or illegally obtained software. Calvert Hospice will provide legally acquired software for organizational use and will comply with all license or purchase terms.

Conflict of Interest

Employees owe a duty of allegiance to Calvert Hospice. Employees may not use their positions to profit personally or to assist others in profiting in any way at the expense of Calvert Hospice. Employees are expected to conduct their activities so as to avoid impropriety and the appearance of impropriety, in all Calvert Hospice business decisions. To determine if specific situations would be classified as a conflict of interest, consult your Manager.



Services for Competitors and Vendors

Employees shall not work for any organization with which Calvert Hospice does business, or which seeks to do business with Calvert Hospice, outside of the normal course of his or her employment with Calvert Hospice without the approval of their Manager. No employee shall be a director, officer, or consultant for any competitor of Calvert Hospice, nor permit his or her name to be used in any fashion that would tend to indicate a business connection with such organization.

Business Relationships

Business transactions with vendors, contractors and other third parties shall be transacted free from offers, solicitation, or acceptance of gifts and favors or other improper inducements in exchange for influence or assistance in a transaction.

Gifts and Gratuities

It is Calvert Hospice's desire at all times to preserve and protect its reputation and to avoid the appearance of impropriety.

Gifts From Patients:

Employees are prohibited from soliciting or accepting monetary tips and personal gratuities from patients. Individuals wishing to make a monetary gift should be referred to the Executive Director. Employees may accept a non-monetary gift of nominal value which is equal to or less than \$25.00.

Gifts Influencing Decision-making:

The offer of, or acceptance of gifts, money, favors, services, entertainment or other items of value, when decision-making or actions affecting Calvert Hospice might be influenced, is absolutely prohibited. Any such conduct must be reported immediately either to the employee's manager or to the Compliance Officer.

Gifts From Vendors:

Employees may retain gifts from vendors that have a nominal value. If uncertain about accepting a gift, consult with your Manager. To the extent possible, these gifts should be shared within Calvert Hospice. Employees may not solicit gifts for themselves or their co-workers from vendors, suppliers, contractors, or other persons. Employees may accept products or services won as door prizes, in drawings, athletic events, or through similar activities.

Vendor Sponsored Entertainment:

At a vendor's invitation and expense, an individual may accept meals or refreshments. Occasional attendance at a local theater or sporting event, or similar entertainment at a vendor's expense may also be accepted. In most circumstances, a regular business representative of the vendor should be in attendance with the employee.

Workshops, Seminars and Training Sessions

Attendance at local, vendor-sponsored workshops, seminars, and training sessions is permitted. Attendance, at vendor expense, at out of town seminars, workshops and training sessions is permitted only with the approval of an employee's manager.



Contracting

All business relations with contractors must be conducted at arm's length both in fact and in appearance and in compliance with Calvert Hospice's policies and procedures. Employees must disclose personal relationships and business activities with contractor personnel that may be construed as influencing the employee's performance or duties. Employees have a responsibility to obtain clarification from their Manager on questionable issues that may arise and to comply, where applicable, with the Calvert Hospice Conflict of Interest Policy.

Business Inducements

Calvert Hospice employees shall not seek to gain any advantage through the offering or giving of payments, business courtesies, or other inducements. Receiving any form of a bribe or other improper payment is prohibited.

Appropriate commissions, rebates, discounts and allowances are customary and acceptable business inducements provided they are approved by Calvert Hospice management and that they do not constitute illegal or unethical payments. Any such payments must be reasonable in value, competitively justified, properly documented, and made to the business entity to which the original agreement was made. Such payments should not be made to individual employees, physicians, or Calvert Hospice independent contractors.

Employees may provide gifts, entertainment, and meals of nominal value to Calvert Hospice customers, current and prospective business partners, and other persons when such activities have a legitimate business purpose, and are reasonable and consistent with all applicable laws. Employees have an obligation to disclose the provision of gifts, entertainment, and meals.

Protection of Assets

All employees will strive to preserve and protect the corporation's assets by making prudent and effective use of Calvert Hospice resources and properly and accurately reporting its financial condition.

Internal Controls

Calvert Hospice has established controls to ensure that assets are protected and properly used. Calvert Hospice has also established controls to ensure that financial records and reports are accurate and reliable. All employees of Calvert Hospice share the responsibility for maintaining and complying with required internal controls.

Financial Reporting

All financial reports, accounting records, research reports, expense accounts, time sheets, and other documents must accurately and clearly represent the relevant facts and the true nature of a transaction. Improper or fraudulent accounting, documentation, or financial reporting is contrary to the policy of Calvert Hospice and may be in violation of applicable laws.



Travel and Entertainment

Travel and entertainment expenses should be consistent with the employee’s job responsibility and Calvert Hospice’s needs and resources. It is Calvert Hospice’s policy that an employee should not suffer a financial loss or a financial gain as a result of business travel and entertainment.

Personal Use of Corporate Assets

Any personal or charitable use of organizational resources must first be approved by the Executive Director. All employees are expected to refrain from converting assets of Calvert Hospice to personal use. All property and business of Calvert Hospice shall be conducted in the manner designed to further Calvert Hospice’s interest rather than the personal interest of an individual employee. Employees are prohibited from the unauthorized use or taking of Calvert Hospice equipment, supplies, materials, or services.

Administration of this Code of Conduct

Calvert Hospice has designated Human Resources to assist employees in obtaining more information about any topic described in the Code of Conduct. Any employee with a need for more information is encouraged to discuss that need with their Manager. If there is a reason that asking your Manager is inappropriate, contact the Compliance Officer. Human Resources and other managers are available to help resolve questions involving applicable laws, ethics, and conduct. Employees should not hesitate to take advantage of this assistance.

Calvert Hospice expects each person to whom this Code of Conduct applies, to abide by the principles and standards found in the Code.

Reporting

The Compliance Officer at Calvert Hospice is a resource for clarification or guidance on matters pertaining to this Code of Conduct. Employees are expected to report suspected violations of the Code of Conduct to their Manager, Human Resources, or the Compliance Officer. The Compliance Officer is responsible for reporting suspected violations of laws, regulations, related Calvert Hospice policies and procedures, or the Code of Conduct.

No retaliation against a Calvert Hospice employee will be made or tolerated for report of a suspected violation made in good faith. All communications will be handled with courtesy and discretion. Confidentiality will be protected to the extent possible, consistent with the law and Calvert Hospice policy.

Investigations

Calvert Hospice is committed to investigating reported concerns promptly and confidentially, to the extent possible. The Compliance Officer or Human Resources compiles findings from the investigation and recommends corrective action or changes where necessary.

Disciplinary Actions

Failure to abide by this Code of Conduct, or the guidelines for behavior which the Code of Conduct represents, may lead to disciplinary action. Discipline for failure to abide by the Code of Conduct may, at Calvert Hospice’s discretion, range from verbal warning to termination.

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OBEY THE LAW

Calvert Hospice will comply with all Federal and State healthcare program requirements. It is critical that all Calvert Hospice employees, student interns, and volunteers meet the highest standards of conduct through strict observance of all laws and regulatory requirements.

As a condition of employment, all Calvert Hospice employees are expected to comply with applicable laws and regulations. Unfamiliarity with relevant laws and regulations is not an excuse for violation. All Calvert Hospice employees must be committed to full compliance with all Federal and State healthcare program requirements and submit accurate billing consistent with such requirements and Calvert Hospice policies and procedures, including compliance with the Code of Conduct.

Calvert Hospice employees can increase their knowledge by asking their managers when assistance is needed to understand applicable laws and regulations. Calvert Hospice employees are expected to participate in training programs, read Calvert Hospice policies, keep abreast with Calvert Hospice publications, take initiative for self-development, and contact the Calvert Hospice Compliance Officer, when appropriate.

Keep Accurate Records

Every Calvert Hospice employee is expected to comply with Calvert Hospice and government requirements regarding record keeping. All records must be prepared accurately, and retained in accordance with retention requirements. This applies to both clinical and non-clinical documentation.

Report Information Truthfully

All communications within Calvert Hospice or with outside organizations must be truthful.

Behave Ethically

Every employee is expected to adhere to high ethical standards in performing duties and to comply with the Calvert Hospice Code of Conduct.

Every employee is expected to avoid situations, which could be viewed as a conflict of interest in which their individual position is used for personal gain.

Maintain Confidentiality

Every employee is expected to comply with Calvert Hospice policies regarding the privacy and confidentiality of proprietary and patient information.

Report Violations

Every employee is expected to report any activity that he or she reasonably believes is in violation of the law, Calvert Hospice policies, or any Federal or State healthcare requirements. Any individual may make reports to his or her Manager or to the Calvert Hospice Compliance Officer. Individuals reporting a suspected violation do not have to follow the chain of command. Reports of violations by Calvert Hospice employees may be made without fear of retaliation. All precautions are taken to protect the anonymity of those filing a complaint, as well as the individual who is the subject of the complaint.

Understand Disciplinary Measures

Calvert Hospice employees are subject to disciplinary action for failure to comply with all State and Federal healthcare regulations and with Calvert Hospice's own Policies and Procedures. This includes failure to report a suspected violation of any Federal or State healthcare program requirements and/or Calvert Hospice Policies and Procedures. Depending on the severity of the violation, disciplinary action may range from oral reprimand to termination. There is a range of penalties that can apply to employees and the institution for violations of Federal and State law. These penalties include monetary fines, civil and criminal legal actions, and exclusion from participation in Federal and State health insurance programs.

My signature certifies that I received, read, and understand the Code of Conduct which is summarized above, and is fully outlined in the Employee Handbook. My signature also certifies that I will adhere to and promote the various elements of this Code of Conduct.

Signature

Date