



Policy # & Policy Title: LR.03.016 Code of Ethics and Professionalism
Effective Date: 07/05/2023

Policy:

At Thompson Health it is of paramount importance that we always conduct our day-to-day activities in an ethical and responsible manner.

Thompson Health CARES Values are an expression of organizational and personal beliefs and convictions. In this statement, we publicly profess how our values will guide our organization's behavior in five areas of organizational activity: Community Accountability, Patient and Resident Care, Organizational Conduct, Fiscal Practice and Marketing. This statement will assist us in weighing our values and choosing among alternate courses of action in decision making and policy setting. A complementary and abbreviated statement of our values is part of the Thompson Health Code of Ethics and Compliance Code of Conduct, also available on the Intranet, under Legal & Regulatory Affairs and is also attached at LR.01.001.00.01.

CONFLICT OF INTEREST

Associates and Board members must refrain from participating in any activity or business venture which could create actual or perceived conflicts with the interests of Thompson Health. Specifically, they may not accept personal payment, including tips, favors, excessive business entertainment or other benefits from any supplier or customer of Thompson Health, nor take any action as a representative of Thompson Health for personal gain. Promotional gift items or holiday gifts of nominal value may be accepted from suppliers though this cannot influence business decisions. Associates may not accept a second job with a customer, competitor or supplier of Thompson Health where there is an actual or perceived conflict unless authorized by Associate Services.

PROPRIETARY AND/OR CONFIDENTIAL INFORMATION

While working at or for Thompson Health, Affected Individuals¹ will learn things about our business and about our patients and residents which are confidential. Every Affected Individual of Thompson Health has a professional and ethical responsibility to treat this information as privileged and to ensure such information is not improperly or accidentally accessed or disclosed. Except as required in the performance of an Affected Individual's duties for Thompson Health, Affected Individuals may not use or disclose any confidential and/or proprietary information such as strategies, marketing plans, profit

¹ "Affected Individuals" means all persons who are affected by Thompson Health's Risk Areas, including Thompson Health's associates, executive team, managers, contractors, agents, subcontractors, independent contractors, volunteers, medical staff members, and its board of directors. "Risk Areas" are those areas of operation affected by the compliance program and shall apply to: billings, payments, ordered services, medical necessity, quality of care, governance, mandatory reporting, credentialing, contractor oversight, and other risk areas that should be identified through organizational experience.

and loss data, management information systems, trade secrets, customer and supplier information and customer and supplier contracts to anyone who does not work for Thompson Health or have a need to know the information.

Upon termination of employment or contract, Affected Individuals must return all Thompson Health property and all copies of documents, notes, USB drives, and other repositories containing pricing lists, invoices, marketing methods, management information systems, financial information, customer lists, and all other information that is not generally public knowledge relating to Thompson Health and not retain any duplicates.

All Thompson Health Associates are required to sign our confidentiality agreement on a yearly basis and are required to comply with all of its provisions. Failure to do so will subject Affected Individuals to disciplinary action, up to and including termination of employment.

PATIENT/PARTICIPANT/RESIDENT BILL OF RIGHTS

All Affected Individuals must uphold the Patient/Participant/Resident Bill of Rights in connection with any work at Thompson Health. Failure to uphold the Patient/Participant/Resident Bill of Rights will subject Affected Individuals to disciplinary action, up to and including termination of employment or contract.

ETHICS WITH COMMUNITY ACCOUNTABILITY

Guided by Our Value of Commitment:

We will provide leadership to improve the availability and quality of health promotion, education and prevention services in our community. All business activities and decisions will be conducted in an ethical manner, in compliance with all laws, regulations and standards of accrediting bodies, with the goal of improving the health and welfare of the community.

Guided by Our Value of Respect:

We will communicate and disclose information and data about Thompson Health in an accurate and objective manner that respects the privacy and dignity of our patients, residents and associates.

Guided by Our Value of Excellence:

We will work with area educational institutions to improve health education for the community, our patients, residents and associates.

Guided by Our Value of Service:

We will coordinate efforts and resources to promote access to comprehensive, affordable and high-quality healthcare. We will collaborate with our community partners to create community solutions to provide care for the medically underserved, the poor, and the underinsured and promote other programs to meet specific community needs.

ETHICS IN PATIENT AND RESIDENT CARE

Guided by Our Value of Action:

We will adopt, promote and follow policies related to the protection of patient and resident rights that are consistent with our overall philosophy and which may be required by law, licensure, or accreditation requirements.

Guided by Our Value of Respect:

We will adopt, promote and follow policies and practices that provide patients and residents with necessary and appropriate information, seek their informed consent for treatment, and support the patient/resident's rights in health care decision making. We will safeguard patient and resident confidentiality and adhere to established procedures for the authorized release of data.

Guided by Our Value of Excellence:

We will strive to ensure that the care provided is appropriate and of the highest quality. We are also committed to creating an environment that provides for the health, safety, and comfort of all patients, visitors and Affected Individuals.

Guided by Our Value of Service:

We will adopt, promote and follow policies and practices that reflect professional ethical codes and ethical responsibilities of clinical staff. We will avoid making organizational decisions that may compromise the ability of clinical staff to provide high quality healthcare.

ETHICS IN ORGANIZATIONAL CONDUCT

Guided by Our Value of Commitment:

We will operate in accordance with all legal, moral, and ethical standards expected of a high-quality health care institution. We will ensure that the religious, spiritual, psychological and physical needs, as well as cultural beliefs and practices of patients, residents and families are respected. We will protect, support and develop our human resources to their fullest potential in a fair and equitable manner.

Guided by Our Value of Action:

We will be responsible to safeguard the resources and interests of Thompson Health.

Guided by Our Value of Respect:

We support and promote diversity, equity and inclusion for all Affected Individuals, patients and residents and will ensure that our system remains free of discrimination and harassment.

Guided by Our Value of Service:

We will communicate our mission, values and system priorities to all Affected Individuals with the expectations that they act in accordance with our mission, values and system priorities.

ETHICS IN FISCAL PRACTICE

Guided by Our Value of Commitment:

We will ensure all documentation, coding and billing is accurate, complete and in compliance with all laws, regulations and regulatory guidance. We will retain reputable, independent accounting firms to conduct our annual financial audits to be performed with the highest ethical standards.

Guided by Our Value of Respect:

We will comply with all applicable state and federal laws and regulations that apply to our business transactions and competitive practices.

Guided by Our Value of Service:

We will engage in ethical and sound financial and billing practices expected in the health care industry.

ETHICS IN MARKETING

Guided by Our Value of Respect:

We will reflect integrity, honesty, and high professional standards in all marketing efforts. We will not seek to damage the professional reputation of other organizations or individuals.

MORE INFORMATION

Any Affected Individual who seeks more information about this Code or is aware of a violation of this Code may reach out to their Thompson Health Supervisor (for associates), Associate Services (for associates) or call the General Counsel/Chief Compliance Officer at 396-6714 or the Compliance Hotline at **585-756-8888**.

Ethics consults may be requested in accordance with [LR.01.001.01 Ethics Consultation Procedure](#).

Supervisor's Procedures for Implementation:

SUPERVISOR'S COMMITMENT

Supervisors are responsible for setting the proper example regarding our Code of Ethics and Professionalism. Questions of interpretation pertaining to this policy are to be referred to Associate Services or the General Counsel/Chief Compliance Officer. The supervisor must immediately notify Associate Services or the General Counsel/Chief Compliance Officer if they believe that an associate or other Affected Individual is involved in an activity that might violate our Code of Ethics and Professionalism.

References:

Committee Review: Ethics Committee Last Approved: 07/05/2023

Joint Commission: N/A

NYSDOH: N/A

Other References: LR.01.001.01 Ethics Consultation Procedure

LR.01.001.00.01 Thompson Health Code of Ethics and Compliance Code of Conduct

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