



Code of Conduct & Ethics

**Committed to the Treatment and Care of
our Patients**



Our Vision

To be recognized as a strong community hospital, providing compassionate and quality care to the residents of DeSoto County and the surrounding areas



Dear Colleague:

The true foundation of DeSoto Memorial Hospital has always been its commitment to provide quality care to our patients. As part of this, we strive to ensure an ethical and compassionate approach to healthcare delivery and management. We must demonstrate consistently that we act with absolute integrity in the way we do our work and the way we live our lives.

This Code of Conduct provides guidance to ensure that our work is done in an ethical and legal manner. It emphasizes the shared common values which guide our actions. It contains resources to help resolve any questions about appropriate conduct in the work place. Please review it thoroughly. Your adherence to its spirit, as well as its specific provisions, is absolutely critical to our future.

If you have any questions regarding this Code of Conduct or encounter any situation which you believe violates provisions of this Code, you should immediately consult your supervisor, another member of management, or the Corporate Compliance Officer. You may also call the **Compliance Hotline at 1-800-273-8452** and remain anonymous if you choose. You have my personal assurance there will be no retribution for asking questions or raising good faith concerns about the Code for reporting possible improper conduct.

We are committed to those ideals reflected in our Mission and Values Statement and in this Code of Conduct. We are equally committed to assuring our actions consistently reflect our words. In this spirit, we want this organization to be a family of men and women of shared values, and we expect all of our colleagues' actions to reflect the high standards set forth in this Code of Conduct.

No code of conduct can substitute for our own internal sense of fairness, honesty, and integrity. Thus, in your daily life and work, if you encounter a situation or are considering a course of action which may be technically within the guidelines of the Code of Conduct, but you are worried that the contemplated action simply "does not feel right", please discuss the situation with any of the resources listed above.

In closing, we trust you as a valuable member of our healthcare team. We ask you to assist us and all of our colleagues in this organization in supporting the values and principles which are critical to achieving our mission.

Sincerely,

Vince Sica, CEO



Vision Mission & Values

Our Mission

DeSoto Memorial Hospital is dedicated to providing quality care and enhancing the health of our community.

Our Vision

To be recognized as a strong community hospital, providing professional, compassionate, and quality care to the residents and visitors of DeSoto County and the surrounding areas.

Our Values

Compassion

We treat those we serve and one another with concern, kindness, and respect.

Integrity

We are open and honest in all we do.

Excellence

We are committed to quality and to adding value in every aspect of our work and we strive to exceed the expectations of our customers.

Community

We acknowledge our vital role in our local communities and seek to understand and serve their needs.

Professionalism

We strive to uphold and exceed our customer's expectations within our realm of expertise, without forgetting human compassion, conforming to technical or ethical standards by following a line of conduct and qualities.

Stewardship

We understand the responsibility of utilizing our resources in a prudent manner



Leadership Responsibilities

While all DeSoto Memorial Hospital (DMH) colleagues are obligated to follow our Code, we expect our leaders to set the example, to be in every respect a model. We expect everyone in the organization with supervisory responsibility to exercise that responsibility in a manner that is kind, sensitive, thoughtful, and respectful. We expect each supervisor to create an environment where all team members are encouraged to raise concerns and propose ideas.

We also expect that they will ensure those on their team have sufficient information to comply with laws, regulations, and policies, as well as the resources to resolve ethical dilemmas. They must help to create a culture within DMH which promotes the highest standards of ethics and compliance. This culture must encourage everyone in the organization to share concerns when they arise. We must never sacrifice ethical and compliant behavior in the pursuit of business objectives.

Specific guidance for leaders throughout the organization regarding their responsibilities under our Ethics and Compliance Program is included in our DMH Policies & Procedures. Leaders at all levels of the organization should use that guidance to most effectively incorporate ethics and compliance into all aspects of our organization.

In addition, the Ethics and Compliance Program, together with our leadership training efforts, encourages what can be referred to as “principled leadership.” Such leadership assumes that those in our organization will lead by example, will confront problems directly and candidly, will be inclusive in making decisions as to who should participate in the decision-making process, will try to give the maximum responsibility to those who work with them, and will emphasize effective team-building. In addition to these fundamental approaches to principled leadership, we expect those in our organization to understand and care about their colleagues at work.

The work of DMH is accomplished each day, for the most part, in small team settings. This encourages all leaders to try to ensure that the talents of each member of the organization are utilized to the maximum extent possible and that we give careful attention to the professional development of all of those within our facility.



Our Guides to Integrity

From senior management and all staff, to hospital-based physicians, to contractors, and other affiliated providers, regardless of our personal responsibilities, everyone associated with DeSoto Memorial Hospital is committed to this Code of Conduct and the Guides of Integrity. We make the following promises:

To our patients: We are committed to treating all of our patients equally, fairly, and with respect. All patients are told of their rights, responsibilities, and health care options.

To our DMH employees: We are committed to a work setting which treats all colleagues with fairness, dignity, and respect, and affords them an opportunity to grow, to develop professionally, and to work in a team environment in which all ideas are considered.

To our affiliated physicians: We are committed to providing a work environment which has excellent facilities, modern equipment, and outstanding professional support.

To our third-party payers: We are committed to dealing with our third-party payers in a way that demonstrates our commitment to contractual obligations and reflects our shared concern for quality healthcare and bringing efficiency and cost effectiveness to healthcare. We encourage our private third-party payers to adopt their own set of comparable ethical principles to explicitly recognize their obligations to patients as well as the need for fairness in dealing with providers.

To our regulators: We are committed to an environment in which compliance with rules, regulations, and sound business practices is

woven into the corporate culture. We accept the responsibility to self-govern and monitor adherence to the requirements of law and to our Code of Conduct.

To the communities we serve: We are committed to understanding the particular needs of the communities we serve and providing the community with quality, cost-effective healthcare. We realize as an organization that we have a responsibility to help those in need. We proudly support charitable contributions and events in the community we serve in an effort to promote good will and further good causes. We promote healthcare education for our patients and community.

To our suppliers: We are committed to fair competition among prospective suppliers and the sense of responsibility required of a good customer. We encourage our suppliers to adopt their own set of comparable ethical principles.

To our volunteers: The concept of voluntary assistance to the needs of patients and their families is an integral part of the fabric of healthcare. We are committed to ensuring that our volunteers feel a sense of meaningfulness from their volunteer work and receive recognition for their volunteer efforts.



Quality of Care & Services

We provide high quality care and skilled, courteous, compassionate, reliable service to all patients, customers, visitors, and our fellow employees.

- We will respect the dignity, comfort and privacy of every individual, employee, and customer, while providing them with consideration, courtesy and respect.
- We will provide appropriate and timely care, by qualified health care professionals including emergency care to all patients without regard to race, religion, color, national origin, sex (including gender identity), sexual orientation, age, or disability.
- We will not deny emergency or urgent medical care or transfer to another facility because of race, religion, color, national origin, sex (including gender identity), sexual orientation, age, or disability.
- We will adhere to DeSoto Memorial Hospital's statement of patient rights.
- We will maintain complete and thorough records of patient information and protect the privacy of our patient's health records to fulfill the requirements set forth in our policies, accreditation standards, applicable laws and regulations.

Privacy & Confidentiality

We maintain the privacy and confidentiality of information entrusted to us in accordance with legal and ethical standards.

- We will respect the privacy of our patients, co-workers and customers and safeguard patient, employee and customer information from physical damage and protect the privacy of our patient's health records according to state, federal and accreditation requirements.
- We will maintain medical and business documents and follow our record retention policy in accordance with the law, HIPAA and other applicable guidelines.
- We will only reveal medical, clinical or business information when such release is supported by a legitimate clinical or business purpose, and is in compliance with DeSoto Memorial Hospital policies and procedures, applicable laws, rules and regulations.
- We will not discuss patient, employee or customer information in any public area, including elevators, hallways, stairwells, restroom, lobbies and dining areas.
- We will exercise care to ensure that confidential and proprietary information is carefully maintained and managed to protect its value including salary, benefits, payroll, personnel files and information on disciplinary matters as confidential information while maintaining computer passwords and access codes in a confidential and responsible manner.



Workplace Conduct & Employment Practices

We recognize that the greatest strength of our organization lies in the efforts and talents of our employees, who create our success and our reputation. We treat each other with respect, dignity and courtesy.

- We provide equal employment opportunities to prospective and current employees, based solely on merit, qualifications and abilities. DeSoto Memorial Hospital shows respect and does not discriminate in employment opportunities or practices on the basis of race, color, religion, national origin, sex (including gender identity), sexual orientation, age, or disability, or any other status protected by law.
- We support and observe a workplace free of alcohol, drugs and tobacco use.
- Reasonable accommodations will be made for employees with disabilities.
- We seek employees, vendors and business partners who have not been sanctioned by any regulatory agency and are able to perform their designated responsibilities.
- We do not tolerate any act of retaliation or reprisal against any employee who in good faith reports suspected violations of law, regulation, DMH policy or our Code of Ethics and have a management team who fosters an “open door policy” and creates a work environment in which ethical concerns will be addressed.
- All employees will receive appropriate training and orientation and have the proper experience and expertise to perform their duties and to meet the needs of our customers.



Information Technology

We safeguard DMH information technology and proprietary electronic information and protect it from improper use and access.

- We follow the laws regarding intellectual properties, including patents, trademarks, marketing, copyrights, and software and do not copy DMH computer software unless it is specifically allowed in the license agreement.
- We maintain and monitor security systems, data backup systems and storage capabilities to ensure that information is maintained safely in accordance with our policies and procedures, state and federal requirements.
- We only allow authorized persons to have access to computer systems and software on a “need to know” basis.

Coding & Billing

We ensure that coding and billing are performed accurately, in accordance with nationally recognized standards and rules. It is the provider’s responsibility to ensure that the information required for proper coding is documented in the patient’s medical record and on the encounter forms and that both accurately reflect the care provided.

We do not:

- bill for items and services not rendered or not medically necessary;
- misrepresent the type or level of service rendered;
- bill for non-covered services;
- bill for services rendered by other providers; or
- misrepresent a diagnosis in order to obtain payment

Cost Reports

A substantial portion of our business involves reimbursement under federal and state government programs that require the submission of cost reports. We must adhere to a wide range of legal and regulatory requirements in the preparation of such cost reports.

We are committed to maintaining the highest ethical and legal standards. Compliance with federal and state laws relating to all cost reports is top priority. These laws and regulations, while highly complex, define what costs are allowable and non-allowable, as well as define the appropriate methodologies to claim reimbursement for the cost of services provided to program beneficiaries. Given this complexity, all issues related to the completion and settlements of these cost reports must be communicated through or coordinated with DeSoto Memorial Hospital's Finance Department.



Additionally, DeSoto Memorial Hospital has established and maintains a high standard of accuracy and completeness in our financial records. These records serve as a basis for managing our business and are important in meeting our obligations to patients and others as well as complying with tax and financial reporting requirements. It is our policy to comply with the reporting requirements of applicable laws, established financial standards, and generally accepted accounting principles.

Adhering to Laws & Regulations



We follow applicable laws and regulations, conduct our business and clinical activity with high standards of ethics, integrity, honesty and responsibility and act in a timely manner that enhances standing in the community.

- We will provide health care services, plan and data management support consistent with federal, state, local laws and regulations that apply to our business and provide DMH staff and agents with knowledge of the governing rules and regulations.
- We do not give or receive any form of payment, kickback or bribe to induce the referral or the purchase of any service. Likewise, we do not accept payments for referrals we make.
- We do not offer any improper inducements or favors to patients, providers or others to encourage the referral of patients to our facilities or to use a particular product or service.
- We avoid inappropriate discussions with competitors regarding business issues.
- We procure, maintain, dispense, and transport drugs or other controlled substances used in the treatment of patients, according to applicable laws and regulations.
- We do not knowingly make any false statements, verbal or written, to government agencies or other payers.

Environmental & Safety Considerations

We are committed to providing a safe and secure environment for patients, volunteers, employees, visitors, and customers.

- We exercise DMH policies & procedures with regard to the environmental aspects of the use of buildings, property, laboratory processes and medical products in accordance with state, federal and accreditation requirements.
- We comply with established safety and infection control policies and procedures, which are intended to prevent job-related hazards, consistent with ergonomic standards and ensure a safe work environment.



- We comply with permit requirements that allow for the safe discharge of pollutants into the air, sewage systems, water or land and comply with all laws and regulations governing the handling, storage, use and disposal of hazardous materials, other pollutants and infectious wastes.

Physician and Provider Relationships

WE DO NOT PAY FOR REFERRALS

We accept patient referrals/admissions solely based on the patient's clinical needs and our ability to render the needed services. We do not, however, pay or offer to pay anyone - employees, physicians, or other persons - for referrals of patients. No employee, or other person acting on behalf of DeSoto Memorial Hospital, is permitted to enter into any agreements, including physicians, which are linked directly, or indirectly, to the referral of patients.

WE DO NOT ACCEPT PAYMENTS FOR REFERRALS THAT WE MAKE

Our physicians and other health care providers make patient referrals solely based on the patient's clinical needs and the abilities of the referred provider to render such services. No employee or any other person acting on behalf of DeSoto Memorial Hospital is permitted to solicit or receive anything of value, directly, or indirectly, in exchange for the referral of patients. Similarly, when making patient referrals to another health care provider we do not take into account the volume or value of referrals that the provider has made (or may make) to DeSoto Memorial Hospital.

WE DO NOT ALLOW PERSONAL INTERESTS TO INFLUENCE REFERRALS

Our policy is to inform patients of their options as to home health, hospice, durable medical equipment, and other ancillary health care services and to promote patient freedom of choice in selecting any services that the patient may require. However, physicians are prohibited from referring patients to other health care providers in which they (or family members or owned entities) have certain financial or compensatory interests.

WE DO NOT PAY PATIENTS

We do not waive insurance co-payments or otherwise provide financial benefits to patients in return for admission. Under certain circumstances, DeSoto Memorial Hospital may provide for appropriate financial arrangements (such as allowing monthly payments over time) to patients based purely on their financial need.



Compliance for all Employees

Conflicts of Interest

A conflict of interest may occur if your outside activities or personal interests influence or appear to influence your ability to make objective decisions in the course of your job responsibilities. A conflict of interest may also exist if the demands of any outside activities hinder or distract you from

the performance of your job or cause you to use DeSoto Memorial Hospital resources (i.e., time, computers, facilities, supplies) for non-hospital purposes. This policy applies to the Board of Trustees, Executive Office, all employees (including physicians with private practices) and volunteers. In avoiding conflicts of interest we keep in mind:

- We work to advance the interests of DeSoto Memorial Hospital.
- We do not compete with DeSoto Memorial Hospital.
- We do not use hospital property, information or position for personal gain.

Duty to Know and Understand

It is the duty of all employees and relevant third parties to know and understand the ethical standards, legal standards, and company policies applicable in performing their daily tasks. DeSoto Memorial Hospital's Corporate Compliance Program is designed to assist all employees to know and understand these ethical and legal standards through training and communication.

Duty to Comply

It is the duty of all employees to comply with applicable laws, rules, regulations, and the Code. Failure to do so may subject employees to disciplinary action.

Duty to Report Actual or Suspected Violations

Employees must report to their Supervisor or the Compliance Officer, actual or suspected violations by employees of applicable law, rules, regulations, or the Code. Employees have the same reporting obligations for actual or suspected violations committed by a subcontractor or vendor of DeSoto Memorial Hospital. DeSoto Memorial Hospital provides multiple reporting options to ensure that employees are comfortable with whom they communicate compliance issues. In the event that the reporter wishes to remain anonymous, he or she is encouraged to make the report through the Compliance Hotline 1-800-273-8452. These calls are managed through an outside agency and reported electronically to the Corporate Compliance Officer for investigation and follow-up.

Record Retention

Medical and business documents and records are retained in accordance with appropriate laws, Medicare Conditions of Participation, and our Record Retention Policy. Records include paper copies and electronic records. Employees must not tamper with records. Employees must not remove records from DeSoto Memorial Hospital property, except in special circumstances, such as when responding to a subpoena. Records must not be destroyed prior to the date specified in the relevant retention schedule.



Disruptive Conduct & Harassment (Sexual or Otherwise)

We are committed to providing a work environment free from discrimination, harassment, bullying, and retaliation (victimization), and providing equal employment opportunities for all employees, applicants, and trainees.

We do not harass anyone. Harassment may include jokes, slurs, or intimidation. DeSoto Memorial Hospital complies with applicable Federal civil rights laws and does not discriminate, exclude, or treat people differently on the basis of race, color, national origin, age, disability, or sex.

We take all allegations of harassment or bullying seriously and address them promptly. Any investigation will be conducted with the greatest degree of confidentiality consistent with completing a fair and thorough investigation.

Intimidation and Retaliation

Retaliating against someone for raising a good faith concern, calling the Compliance/Ethics Hotline or for cooperating with an investigation is prohibited. Retaliation is taken very seriously and if it occurs will result in discipline, up to and including termination of employment.

Obeying the Law

Obeying the law sounds easy enough, but it can be complicated, especially since so many of the laws and regulations that apply to us are intricate, including fraud and abuse laws, Medicare's Conditions of Participation, Joint Commission, as well as other federal and state laws. If we have questions about any laws that apply to us, we should contact the Corporate Compliance Office at Ext. 697 or Direct Line 863-993-7697



**compliance
hotline**

800-273-8452



Code of Conduct & Ethics for Chief Executive and Senior Financial Officers

The attitude and actions of the Chief Executive Officer (CEO), Senior Financial Officers (Chief Financial Officer and Controller) and the Director of Nursing (DON) of DeSoto Memorial Hospital (DMH) are crucial for maintaining the hospital's commitment to the following underlying principles and philosophies.

- (I) DMH is committed to honest and ethical conduct and expects the CEO, CFO, DON and Controller to exemplify such conduct.
- (II) DMH is committed to full, fair, accurate, timely and understandable disclosure in the hospital's public reports and communications.
- (III) DMH will comply with applicable federal and state laws, rules, and regulations.

Accordingly, DeSoto Memorial Hospital's Corporate Compliance Officer and the Board of Directors has developed and adopted this Code of Conduct & Ethics applicable to its CEO, CFO, DON and Controller with the goal of promoting the highest moral, legal, and ethical standards and conduct within the organization.

Honest and Ethical Conduct

While DMH expects honest and ethical conduct in all aspects of the organization's business from all employees, DMH expects the highest possible honest and ethical conduct and integrity from the CEO, CFO, DON and Controller. These officers must set an example for the organization's employees and DMH expects these officers to encourage a culture of transparency, integrity, and honesty.

Conflicts of Interest

Service to DMH should never be subordinated to personal gain or advantage. If the CEO, CFO, DON, or Controller becomes aware that he or she is in a situation that presents an actual or perceived conflict of interest (i.e., any situation in which such individual's potential for private interest or personal gain interferes or appears to interfere with the interests of DMH), or is concerned that an actual or perceived conflict of interest might develop, he or she is required to discuss the matter with the Chairman of the Board and the Corporate Compliance Officer for the purpose of developing a means for the ethical handling of that situation. In this connection, the CEO, CFO, DON and Controller should periodically review the DMH Conflicts of Interest Policy and make efforts to follow and document its application within the organization.

Disclosure

The CEO, CFO, DON and Controller shall promptly bring to the attention of the Board of Directors any information he or she may have concerning problems within the financial processes of DMH. Such problems may include (i) significant deficiencies in the design or operation of internal controls which could adversely affect DMH's ability to record, process, summarize and report financial data, or (ii) any fraud, whether or not material, or (iii) any actual or perceived conflicts of interest



between personal and professional relationships, involving any management or other employees who have a significant role in the organization's financial reporting, disclosure or internal controls.

In the performance of their duties, the CEO, CFO, DON, and Controller are prohibited from knowingly misrepresenting facts. The CEO, CFO, DON, or Controller will be considered to have knowingly misrepresented facts if he or she knowingly:

- (i) Makes, or permits or directs another to make, materially false or misleading entries in financial statements or records;
- (ii) Fails to correct materially false and misleading financial statements or records;
- (iii) Signs, or permits another to sign, a document containing materially false and misleading information; or
- (iv) Falsely responds, or fails to respond, to specific inquiries of DMH's external auditors.

The CEO, CFO, DON, and Controller are prohibited from directly or indirectly taking any action to interfere with, fraudulently influence, coerce, manipulate or mislead DMH's independent public auditors in the course of any audit of DMH's financial statements or accounting books and records.

Compliance with Law

It is DeSoto Memorial Hospital's policy to comply with all applicable laws, rules and regulations. It is the personal responsibility of the CEO, CFO, DON, and Controller to adhere to the standards and restrictions imposed by those laws, rules, and regulations, and in particular, those relating to accounting and auditing matters. The CEO, CFO, DON, and the Controller each shall promptly bring to the attention of the Leadership Team any information he or she may have concerning evidence of a material violation of securities or other laws, rules or regulations applicable to DMH and the operation of its business, by DMH or any agent thereof, or of a violation of DMH's Code of Conduct & Ethics.

Accountability

The CEO, CFO, DON, and Controller each shall certify annually in writing to the Board of Directors that he or she has fully complied with this Code of Conduct & Ethics.

The Board of Directors shall determine or designate appropriate persons to determine, appropriate actions to be taken in the event of violations of this Code of Conduct & Ethics by the CEO, CFO, DON, or Controller with the goal of deterring wrongdoing and promoting accountability for adherence to this Code of Conduct & Ethics. Actions may include censure, demotion or reassignment, suspension with or without pay or benefits and termination of employment.

References:

DMH (2009). Guide Posts: Road to Integrity
HCA (2009, January 1). Code of Conduct.
Moseley, G. III, (2015) Managing Legal Compliance in the Healthcare Industry. Burlington, MA: Jones & Bartlett Learning.
Sheeder, F. (2014). Corporate Governance and Compliance for Healthcare. New York, NY: Wolters Kluwer Law & Business.
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