

LMH Health Code of Conduct

Purpose

The Lawrence Memorial Hospital including its physician clinics (“LMH Health”) is committed to:

- Being an inclusive, diverse workplace;
- Valuing every person and their dignity;
- Providing safe, quality and equitable care;
- Treating others with respect, kindness and understanding;
- Acting honestly and ethically; and
- Following the law.

To support these commitments, this Code of Conduct (“Code”) sets out common values and beliefs that we all must follow. Following the Code and our Compliance Program will ensure that our choices and behavior remain consistent with LMH Health’s commitments.

If you see or hear of conduct that is contrary to any commitment or this Code, take prompt action. Above all, act to prevent harm to patients and others. If possible, correct or resolve the issue. Once safety is restored or the issue is resolved, report it. For ways to report, see the Code’s “How to Report” section.

Scope

This Code and our Compliance Program apply to our Trustees, officers, employees, vendors, and other persons or entities who provide items or services to LMH Health (or its patients) (collectively, “covered persons”). The term includes volunteers, medical staff, and students. There are no exceptions.

“Us”, “our” and “we” means both LMH Health and all covered persons. “You” means any covered person.

Cultural Values

LMH Health’s cultural values are – *People First, Integrity Matters and Better Together*. While at LMH, these Values govern your decisions and actions. Collectively, they require us to put aside our personal interests and fears, and to be engaged in our work. Fear inhibits teamwork. Be fearless – share information, ideas and concerns. Ask for help or guidance without fear or hesitation.

People First

Treat everyone with kindness and compassion. Your interactions should preserve every person’s value and dignity. When we offend, apologize—even if no offense was intended. The way people feel after you interact with them is important.

Our Purpose

LMH Health's purpose is to be a "partner for lifelong health." All interactions and decisions need to be consistent with this purpose.

Non-Discrimination

We provide care based solely on a person's medical needs. LMH Health does not discriminate, in its care or treatment, based on a person's status (i.e., their race, religion, age, ethnicity, culture, language, socio-economic status, sex, sexual orientation, gender identity or expression, national origin, disability). LMH Health also follows the Emergency Medical Treatment and Labor Act (EMTALA).

LMH Health does not permit discrimination or harassment in the workplace based on a person's status.

Health Equity

LMH Health is committed to health equity.

Health equity is attaining the highest level of health for all people, where every person has a fair and just opportunity to obtain optimal health, regardless of the person's status. LMH Health was founded on health equity by Elizabeth Watkins. Her gift's single condition became our Abiding Commitment:

No person shall be excluded from receiving care on account of race, or physical, social or financial condition.

Health equity requires us to care for and protect the health of every person. It requires us to identify and remove barriers or influences within our control that affect access to care and positive health outcomes.

Patient Rights

We inform patients of their rights. We protect their rights and dignity. We encourage patient and family involvement in all aspects of care. We follow our policies and the law during the admission, transfer and discharge process.

Patient Choice

We respect our patients' choices. We take the time and effort (including the use of interpreter services) to ensure our patients understand their medical condition. We inform patients of their treatment needs and options (including the related risks and benefits). We allow them to accept or refuse treatment. We follow their advance directives and end of life decisions.

Quality & Safety

Our patients' health and safety is paramount. To protect both, LMH Health encourages teamwork and requires prompt resolution of issues and conflicts. Conflicts or other unresolved issues place our patients

at risk or diminishes the quality of their care. To protect everyone, you can civilly address disrespectful or intimidating behaviors when they happen. These behaviors prevent collaboration, open communication and teamwork. LMH prohibits conduct that undermines our Culture of Safety.

Dual Relationships

You must remain unbiased and objective while caring for our patients. You may not treat any person if your clinical judgment or effectiveness is (or may be) impaired for any reason (e.g., a friendship, religious belief).

We Protect Others

We protect the vulnerable. We report abuse and neglect as required by law.

Workplace Civility

We hold ourselves and each other accountable for how we treat others, and the way people around us are treated. We listen to understand. We invite input by being curious and asking questions. LMH Health encourages useful, actionable and civil feedback. LMH does not permit demeaning behavior.

Be fair to everyone. Exclusion based on bias or prejudice is disrespectful. Seek out diverse opinions. *People First* requires each person to use a collegial approach. We base all interactions on mutual respect and understanding. Appreciate people even when you do not agree with them. We show regard for others by listening, offering help and being respectful. Avoid conduct that causes resentment or embarrassment.

We do not engage in rude or threatening behavior. We do not make statements that cause any person to reasonably believe safety is at risk, even if made in jest. Everyone should foster a *People First* workplace.

Integrity Matters

Integrity requires you to act with fairness. It holds us accountable for our choices. It prohibits illegal, dishonest, and unethical conduct. It requires us to report our mistakes, concerns or violations.

We Do The Right Thing

Doing the right thing is every person's responsibility. At a minimum, doing "*the right thing*" means we act ethically, honestly, and with integrity, even when no one is watching. It means knowing and obeying our policies and the law. It requires us to look for ways to improve.

Doing the right thing requires each person to speak up when behavior appears to violate any LMH Health commitment (including the Code or Compliance Program). Every person must maintain compliance with:

- Federal, state and local laws, rules and regulations;
- Our Commitments, and Cultural Values; and
- Our internal policies, and applicable Joint Commission (TJC) Standards.

Doing the right thing ethically means more than simply ensuring lawful conduct. It may require difficult or

unpopular choices. We may decide not to engage in an activity we believe is exclusive or harmful to an individual or group. Ethical behavior requires us to speak up when mistakes occur.

We Follow Our Policies

LMH Health has adopted other Standards. We fairly and consistently apply our Standards. You can find them in our policy database, currently Policy Tech. You must familiarize yourself with, and follow, the policies and procedures that apply to your job and its responsibilities.

Coding & Billing Compliance

We comply with all payer requirements (e.g., Medicare, Medicaid, etc.)

Medically Necessary

LMH Health requires covered persons to base their care, treatment and services on the patient's medical condition(s) and sound clinical practices.

Chart Documentation

Patient safety and quality care require thorough and accurate charting. It is also essential for coding and billing compliance. All medical record entries must:

- ✓ Be clear, complete and accurate (truthful).
- ✓ Reflect the *exact* level of care, services or treatment provided.
- ✓ Be made at (or near) the time care is rendered, or as soon as possible thereafter.
- ✓ Comply with applicable laws, regulations and LMH Health's policies and procedures.

Appropriate Claims

We only bill for the items and services that are medically necessary. Claims only reflect the actual items and services ordered, documented, and performed.

We follow federal health care program requirements. We remain familiar with coverage rules that apply to the items and services we provide.

Guidance

LMH Health is committed to the complete and accurate coding and billing of claims. LMH requires covered persons who code and bill claims to adhere to applicable policies, laws, rules, regulations including, official coding and billing guidelines. LMH prohibits covered persons from knowingly presenting, or causing to be presented, claims for payment or approval, which are false, fictitious or fraudulent. You may not engage in any deception or misrepresentation if it could, or does, influence or overstate LMH's entitlement or payment under any health care program.

Fraud, Waste & Abuse

LMH Health bills Medicare and other federal health care programs. These claims are subject to various laws designed to prevent Fraud, Waste and Abuse (FWA). FWA laws impose civil and criminal penalties and fines. If you report FWA, these laws also protect you from retaliation.

To learn more about FWA, see our Compliance – *Preventing & Reporting Fraud, Waste & Abuse* policy, #8060-010; our *False Claims Act/Deficit Reduction Act* policy, # 8060-013; and our *Compliance – Federal AKS and Stark Law* policy #8060-006.

Referral Sources

LMH Health prohibits conduct and business courtesies that illegally influences, or appears to improperly influence, referrals or any business payable by federal health care programs. All contracts and interaction with any referral source must follow the law and LMH's policies.

Overpayment

LMH Health identifies and returns any moneys it receives in excess of the amount due and payable to it under health care program requirements. If you suspect clinical, coding, or billing practices that may result in overpayments, tell your supervisor, the Compliance Officer, or call the Integrity Hotline (**877-474-1363**) (the "Hotline").

Health Insurance Portability & Accountability Act (HIPAA)

Privacy is a fundamental right. We protect our patients' privacy rights, and honor the sensitive nature of protected health information (PHI), by keeping their records secure, private and confidential. No one may access, use, or disclose PHI unless (a) it is necessary to perform a job-related duty, and (b) the access, use or disclosure is permitted or required by HIPAA.

Diversion

We do not misuse or divert items or supplies, including prescription drugs and controlled substances. The use of any item or supply must be for legitimate and lawful purposes. We accurately document their use (including the waste of controlled substances) in the patient's medical record.

Equal Opportunity

LMH Health is an equal opportunity employer. We do not discriminate against qualified employees or job applicants with respect to employment conditions or privileges. LMH treats all persons equally regardless of a person's status.

Other Activities

Tax-Exempt Status

LMH Health is a tax-exempt organization. We do not operate for the financial benefit of private interests. LMH's assets or financial resources may not be used for private benefit or gain.

Stewardship of Resources

We preserve and protect LMH Health's assets and resources. We manage and use them efficiently, and exclusively to serve our patients.

Record & Reporting Accuracy

LMH Health requires all records and reports to be accurate, clear and complete. Financial records and any reports (including time and expense records) must fairly and accurately represent transactions. They must conform to applicable laws, policies and accounting principles.

Record Retention

We retain our records as required by law. Once a retention period expires, we may destroy records unless we are aware of an existing investigation or lawsuit. In these cases, we do not destroy records until legal counsel approves it. During a legal proceeding, LMH Health does not permit the destruction of records to avoid discovery.

Political Activities

Except as permitted through political action committees, LMH Health does not take part in political campaigns, or make political contributions. This includes publishing or distributing statements on behalf of or in opposition to any candidate for public office. A covered person may not use their position at LMH or LMH assets (e.g., emails, time, phones, or personnel) for political campaigns or endorsements.

LMH Health may take part in lobbying activities (to advocate for or against the passage of legislation) for issues that affect the health and wellbeing of our community. LMH's lobbying efforts cannot constitute a substantial part of its overall activities.

Antitrust Laws

We comply with antitrust laws. Generally, these laws prohibit competitors from entering into agreements to fix or stabilize prices, or reduce price competition. We do not engage in unfair practices that illegally restrict trade or competition.

Excluded Parties

LMH Health does not submit claims for items or services if they are provided by persons or entities that have been excluded from participating in federal or state health care programs.

For more information, see our *Screening Procedures for Employees and Business Partners* policy.

Confidential Information

LMH Health requires you to protect and secure its confidential information. This confidential information includes all non-public information and any matter protected by law. You may not share confidential information with anyone outside the organization. You may not share it with co-workers unless they have a job-related reason to know it. For more information, see our *Confidentiality* policy, #8010-034.

Requests for Information

LMH Health only permits certain people to speak on its behalf, or to respond to certain record requests. You should direct all media inquiries or requests to the (on-call) Public Information Officer. If a government official or agent makes a request, only the Chief Executive Officer (or designee) can respond on LMH's behalf. The release of PHI or other patient information must comply with HIPAA.

We cooperate with accrediting bodies, official investigations, audits or other legal proceedings. Our responses are truthful and we will provide relevant (non-privileged) records. We do not destroy, or alter information.

Conflicts of Interest

You must avoid personal interests and other outside activities or obligations that conflict, or reasonably appear to conflict, with LMH Health's interests. You must tell us when any outside activities or personal situations influence, or may appear to influence, your judgment. You may not make clinical or business decisions if a real or apparent conflict exists.

Every transaction must be in LMH Health's best interests and solely for its benefit. You may not use your position, or LMH property or information, to compete against LMH or for your personal gain or benefit.

For more information, see our *Conflicts of Interest* policy.

Gifts

You may not offer or accept gifts or courtesies that violate the law, or create actual or apparent conflicts of interest. You may not accept any travel, entertainment, or educational opportunities unless they comply with the law and our policies. For more information, see our *Gifts, Gratuities & Business Courtesies* policy.

Intellectual Property

We comply with all applicable intellectual property laws. These laws include, but are not limited to, patents, trademarks, service marks, software licenses, trade secrets and copyrights.

Vendors

Vendors and their staff must register every time they enter our facilities. LMH Health may terminate contracts with vendors if they fail to comply with the Code or our Compliance Program.

Workplace Safety

We follow occupational health and safety policies. We report workplace hazards. We follow environmental laws (including the proper handling and disposal of hazardous materials and medical waste).

Better Together

You are important to the success and reputation of LMH Health. High-quality, safe and effective patient care requires more than professional competency. It requires mutual respect, empathy, collaboration, and open, honest communication. *Better Together* requires you to share your knowledge and to listen to others. It also requires open communication of challenges, concerns, risks and opportunities.

High Reliability Organization (HRO)

To be a successful HRO, we must openly discuss risks and find ways to prevent harm before it occurs. Speaking up and working together protects us and our patients from potentially tragic results. To control and mitigate our risks, LMH Health asks you to use HRO principles and tools. For example, use a team approach to patient care, ask clarifying questions, and speak up if you have safety concerns. In an HRO, everyone is required to speak up, contribute their expertise, and work together to prevent harm.

We Stop & Ask

Our Code does not contain every standard (legal or ethical obligation), nor does it cover every situation that you may encounter. When the right course of action is not clear or defined, ask yourself, is the intended decision or conduct:

- ✓ Consistent with our Code and Cultural Values?
- ✓ A decision I would be proud of if made public?
- ✓ Fair and respectful to everyone concerned?
- ✓ A decision that might compromise LMH Health's reputation?
- ✓ Harmful to any person (patients, co-workers)?
- ✓ Something that promotes our purpose and our Abiding Commitment?
- ✓ Consistent with our policies (including this Code)?
- ✓ Compliant with the ethical standards applicable to my profession?
- ✓ A valid use of public resources (e.g., Medicare)?

If the right course of action is still not clear, ask for guidance or escalate it. For guidance, you can ask Human Resources (HR), your Director or Compliance Management. For escalation, see our *Chain of Command* policy, #8010-003. *Better Together* means you are never alone – everyone is obligated to help resolve concerns.

Inclusion, Diversity & Equity

To honor our Abiding Commitment, LMH Health requires you to practice Inclusion, Diversity and Equity (ID&E). We use ID&E to examine our policies, programs, decisions and actions. For more details, see our *Equity Impact Analysis Tool*.

ID&E seeks and invites meaningful involvement from each person and group. At LMH, your opinions matter!

Inclusion requires us to act so all individuals and groups feel welcomed, respected, supported and valued.

Diversity asks us to consider the variety of personal experiences, values and viewpoints that arise from our differences.

Equity requires us to identify and eliminate barriers that prevent every person's full participation.

Your conduct and decision-making must use ID&E. Invite, listen to and consider different experiences and opinions. ID&E requires us to be thoughtful and to work to understand another's perspective, even if we do not agree. We value different ways of thinking. ID&E helps us honor every person and their unique abilities and experiences.

Reporting

Collectively, our Cultural Values require us to speak-up when processes or individuals fail to comply with LMH Health's commitments. As an HRO, we use these reports to learn and improve.

Why We Report

Our Cultural Values require us to share workplace concerns, questions and mistakes. Speaking up matters because *Better Together* protects everyone. We take ownership for what occurs in our workplace. We do not ignore concerns. LMH Health, your wellbeing and our patients and coworkers depend on every person's full participation.

Ultimately, "looking the other way" or not speaking up because you are uncertain lacks integrity. When you suspect a problem or potential for harm, silence violates our Code. If it involves the workplace, it concerns all of us. Your experiences and perspectives matter. To provide excellent care, we need to collegially address and resolve conflicts and other distractions.

NOTE: The real-time resolution of events, including misconduct, is every person's obligation. Take prompt action to resolve or correct events before you report them.

How We Report

There are many ways to share your concerns, questions, mistakes, and opinions. The method you use to report is up to you.

Internal

You may tell your supervisor. If you are not comfortable doing so, you can talk to the Director or Senior Leader of your area. You can tell HR or the Compliance Officer.

Anonymous

If you do not want anyone to know who you are, call our Hotline. You can use the Hotline to voice any concerns, to ask questions or if other reporting methods have not been effective. For more information, see our *Integrity Hotline* policy, #8060-004.

External

If your concern involves an illegal or unsafe practice, report it externally. Depending on the issue, you can report to TJC, the Office of Inspector General (OIG), or any other official.

For other ways to report, see our *Compliance – Event Reporting* policy, #8060-002.

Our Response

LMH Health responds with “Just Culture” principles. A Just Culture’s focus is on system improvement (e.g., changing flawed processes, or inefficient workflows). Using these principles, LMH will learn from reported events, as opposed to simply blaming people for them. According to TJC, system flaws are “the cause of most errors or hazardous conditions.”

In a Just Culture, LMH Health is held accountable for its systems while staff are held accountable for the choices they make.

We use reports to drive improvement and safety. We correct our mistakes and intentional or inadvertent wrongdoing. When directed by our legal counsel, LMH will report its findings to state or federal agencies.

LMH Health understands the importance of feedback. Individuals need to know their efforts have meaning. When the law permits, LMH will report how it responds to reported events.

We Do Not Allow Retaliation

Our policies and the law prohibit any adverse or retaliatory action against any person who (honestly) reports actual or suspected violations of LMH Health’s “commitments” (this Code and our Compliance Program). These protections exist even if your belief or concern turns out to be incorrect. However, you are not protected if you deliberately lie or misrepresent information (e.g., make false statements). For more information, see our *Open Door & Non-Retaliation* policy, #8060-001.

Amendments

This Code does not give contractual or other legal rights to any person or entity. LMH Health may amend or revise this Code at any time.

Definitions

“Compliance Program” means LMH Health’s compliance and ethics program. It includes the Code, Compliance Plan, and related policies and procedures. Our program acts to promote and encourage ethical conduct and our compliance with the law. It helps us fulfill our obligation to detect, prevent and correct misconduct.

“Vendor” means any third-party who works on LMH Health’s behalf. It includes suppliers, independent contractors, and consultants.

DOCUMENT HISTORY			
Rev	Date	Approved By	Comment
0	08/24/2004	Compliance Officer	Creation of Original Document
1	11/18/2009	Compliance Committee; Board of Trustees	Approved
2	06/01/2013	Administrative Council	Minor Revisions; Approved
3	03/01/2014	Administrative Council	Approved
4	03/01/2017	President & CEO	Revised; Approved
5	07/01/2018	AVP of Clinical Excellence	Revised; Approved
6	07/2/2019	Director Compliance; AVP of Clinical Excellence	Major Revisions; Approved
7	07/28/2021	Compliance Officer; Compliance Committee	Major Revisions; Approved
8	02/13/2025	Senior Leadership Team; Executive Compliance Committee	Major Revisions; Approved