



**Policy # & Policy Title:** LR.03.016 Code of Ethics and Professionalism  
**Effective Date:** 07/21/2019

**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.

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**CONFLICT OF INTEREST**

Associates must refrain from participating in any activity or business venture which could create actual or perceived conflicts with the interests of Thompson Health. Specifically, associates 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 the VP of Associate Services.

**PROPRIETARY AND/OR CONFIDENTIAL INFORMATION**

While working at Thompson Health associates will learn things about our business and about our patients and residents which are confidential. Every associate 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 associate's duties for Thompson Health, associates may not use or disclose any confidential and/or proprietary information such as strategies, marketing plans, profit and loss data, management information systems, trade secrets, customer and supplier information and customer and supplier contracts to anyone who does not work for us or have a need to know the information.

Upon termination of employment, associates must return all company property and all copies of documents, notes, computer disks, flash drives, and other repositories

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containing pricing lists, invoices, marketing methods, management information systems, financial information, associate or customer lists, and all other information that is not general 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 associates to disciplinary action, up to and including termination.

### **PATIENT/PARTICIPANT/RESIDENT BILL OF RIGHTS**

All associates must uphold the Patient/Participant/Resident Bill of Rights. Failure to uphold the Patient/Participant/Resident Bill of Rights will subject associates to disciplinary action, up to and including termination. Upon orientation to Thompson Health, associates will be oriented to the Patient/Participant/Resident Bill of Rights.

### **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 other 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 share in 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:**

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We will promote policies and practices that provide patients and residents with necessary and appropriate information, seek their informed consent for treatment, and support the individual's rights in health care decision making.

**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 associates.

**Guided by Our Value of Service:**

We will safeguard patient and resident confidentiality and adhere to established procedures for the authorized release of data. Our relationship with associates, patients and residents will reflect an appreciation for diversity and be free of discrimination and unfair treatment.

**ETHICS IN ORGANIZATIONAL CONDUCT**

**Guided by Our Value of Commitment:**

We will strive to operate in accordance with high legal, moral, and ethical standards which fully recognize justifiable expectations of the public we serve. We will strive to accommodate the desires of the associates and the medical staff to embody religious and moral values in their professional activities. We will ensure that the psychological, social, spiritual and physical needs and cultural beliefs and practices of patients, residents and families are respected. We will maintain a safe environment providing for the health, safety, privacy and comfort of all patients, residents, visitors and associates. 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 work collaboratively to avoid or mitigate conflicts of interest in external relationships. We will be responsible to safeguard the resources and interests of Thompson Health.

**Guided by Our Value of Respect:**

We will promote policies and practices that respect the professional ethical codes and responsibilities of associates and medical staff and be sensitive to organizational decisions that might be interpreted as compromising their ability to provide high quality healthcare.

**Guided by Our Value of Service:**

We will communicate our mission, values and priorities to all associates, volunteers and medical staff whose care and service activities are the most visible embodiment of the organization's ethical commitments and values.

**ETHICS IN FISCAL PRACTICE**

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**Guided by Our Value of Commitment:**

We will conduct annual financial audits by persons who are from outside the organization to ensure ethical practices. We will ensure that all diagnoses are properly coded, and billing transactions reflect appropriate costs incurred.

**Guided by Our Value of Respect:**

We will comply with the federal anti-trust and trade regulation laws. These laws strictly prohibit any activities which might restrain trade or lessen competition. If violated, these laws provide for both civil and criminal penalties.

**Guided by Our Value of Service:**

We will provide and engage in ethical financial and billing practices which are based on sound business practices prevailing in the healthcare field and designed to ensure accuracy.

**ETHICS IN MARKETING**

**Guided by Our Value of Respect:**

We will strive to reflect integrity, honesty, good taste and high professional standards in all marketing efforts affecting the people we serve. We will not intentionally damage the professional reputation of other organizations or individuals or make public judgment on the quality of ethics of others.

**MORE INFORMATION**

If you have questions regarding the application of this policy, it is recommended that you meet with your supervisor or Associate Services. You may also call the Corporate Compliance and Ethics Consult Hotline at 396-6234.

**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. The supervisor must immediately notify Associate Services if (s)he believes that an associate is involved in an activity that might violate our business code of ethics.

**References:**

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**Committee Review:** Ethics Committee Approved: 07/3/2019  
**Joint Commission:** N/A  
**NYSDOH:** N/A  
**Other References:** LR.01.001.00.01 Thompson Health Code of Ethics and Compliance Code of Conduct  
LR.03.015 Compliance Code of Conduct  
LR.01.003 Corporate Ethics Statement  
**Review Cycle:** 12 months  
**Author:** Elizabeth Talia (Vp Legal&Reg Affairs/Coun)  
**Policy's Dept.:** 03.930 - Legal & Regulatory Affairs  
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**Applies To:** System  
**Department List:** All  
**Approved By:** Lalena Symonds (Legal & Compliance Admin), Michael Stapleton (President Ceo Ffths)