

## LAKE CITY COMMUNITY HOSPITAL CODE OF CONDUCT

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1. All hospital governing board members, officers, managers, employees, physicians, and , where appropriate, contractors and other agents, are required to abide by the standards set forth in the code of conduct and policies/procedures that govern the facility. Any violations or suspected violations should immediately be reported to a supervisor, to a member of management, or to the Compliance Officer (hereafter referred to as CO). LCCH is committed to complying with all federal and state standards, with an emphasis on preventing “fraud and abuse”. A lockbox has been provided for anonymous reporting of possible violations. The lockbox is located by the time clock near the Administration office. Retribution or retaliation against those who, in good faith, report a possible violation is strictly prohibited. Any employee who deliberately makes a false accusation with the purpose of retaliating against or harming another employee will be subject to discipline, up to and including termination of employment.
  2. No employee, Board member or medical staff appointee may make improper use of LCCH property or permit others to do so. Examples of improper use include the unauthorized appropriation or personal use of services, equipment, technology and patents, software, and computer and copying equipment, and the alteration, destruction or disclosure of data. Occasional use of telephones, copying machines and office supplies, when the cost is insignificant, is permissible.
  3. Seeking, accepting, offering or making any payment, gift or other thing of value to or from any subcontractor, vendor, supplier or potential contractor for the purpose of obtaining or acknowledging favorable treatment under a private or government contract or subcontract is strictly forbidden.
  4. Hospital employees may not receive any gift under any circumstances that could be construed as an improper attempt to influence the Hospital’s or the employee’s decisions or actions. The hospital employee may receive gifts when they are of such limited value that they could not reasonably be perceived by anyone as an attempt to affect the judgment of the recipient. For example, token promotional gratuities such as advertising or promotional novelties are not prohibited under this policy. If the employee has any question about whether such a gift is acceptable, he or she should contact the CO or the CEO for guidance.
  5. The hospital recognizes that business dealings may include a shared meal or other similar social occasion, which may be proper business expenses and activities. More extensive entertainment; however, will only rarely be consistent with hospital policy and should be reviewed and approved in advance by the CO or the CEO.
  6. All entries on books and records, including financial records, clinical records and expense accounts, shall be accurate and complete and conform to applicable policies and regulations.
  7. Employees shall use their best effort to avoid violations of federal copyright laws, including, but not limited to laws pertaining to computer software.
  8. Required time records shall be completed in a timely and accurate manner. No cost should be allocated which is unallowable, misallocated, contrary to a contract provision or otherwise improper.
  9. All Board members, employees and medical staff appointees shall refrain from any conduct during the performance of their duties that has the appearance of impropriety or that could reasonably be construed as contrary to the interests and mission of this organization.
  10. The hospital participates in the Medicare program, a federally funded program which provides health insurance to the aged and disabled, and the Medicaid program, a federal/state program which provides health insurance to low income persons. Federal law makes it illegal for the hospital to provide or accept “remuneration” in exchange for referrals of patients covered by Medicare or Medicaid. The law also bars the payment or receipt of such remuneration in return for directly purchasing, leasing, ordering or recommending the purchase, lease or ordering of any goods, services or items covered under the benefits of Medicare or Medicaid. In South Carolina, a similar state statute applies equally broad prohibitions relative to all patients, regardless of the payer source.
- The so called “fraud and abuse” or “anti-kickback” laws are designed to prevent fraud in the Medicare and Medicaid programs and abuse of the public funds supporting such programs. LCCH is committed to carefully observing the anti-kickback rules and avoiding any practice that may be interpreted as abusive. Employees in the finance department, purchasing and facilities departments:

laboratory, pharmacy, medical staff administration and any other department entering into personal service contracts are expected to be vigilant in identifying potential anti-kickback violations and bringing them to the attention of the CO or to the CEO.

11. We realize the sensitive nature of a patient's medical condition, history, medication, and family illnesses and we are committed to maintaining that confidentiality. We, therefore, do not use or disclose patient-specific information unless it is permitted or required by law, unless the patient has authorized such disclosure. We must never use or disclose in a manner that would violate the privacy of our patients. No LCCH employee, affiliated physician or other healthcare personnel has a right to any patient information other than that necessary to perform his or her job. Patients can expect that his or her privacy will be protected and that patient-specific information will be released only to others as permitted or required by law or by the patient.
12. LCCH is committed to the avoidance of apparent, as well as actual, conflicts of interest. Any employee having a material relationship that could reasonably be expected to present an actual or apparent conflict of interest is required to disclose such relationship to the HR Director.
13. We follow the Emergency Medical Treatment and Active Labor Act (EMTALA) in providing emergency medical treatment to all patients, regardless of ability to pay. In an emergency situation, financial and

demographic information will be obtained only after the immediate needs of the patient are met. We do not admit or discharge patients based simply on their ability to pay.

14. We will not knowingly hire, retain, employ or contract with any individuals or entities that have been excluded from participation in any government program and we will not knowingly conduct business or continue to conduct business with any individuals or entities, whether contractors, suppliers, subcontractors, or vendors, who have been excluded from participation in any government program. An appropriate background search as required by policy will be performed for each new employee.
15. LCCH will not allow employees nor independent contractors to work/perform services for the hospital without valid, current licenses or credentials required for professional duties.
16. We strictly prohibit any form of unlawful employee harassment or workplace violence. We encourage the reporting of any such incident.
17. Where investigations substantiate a compliance violation, appropriate corrective action shall be promptly initiated; this may include, restitution of any overpayment amounts. Anyone determined to have violated the Code is subject to disciplinary action. The discipline will depend on the nature, severity and frequency of the violation.
18. LCCH requires all employees to sign an acknowledgement confirming they have received the Code of Conduct and agree to abide by these standards.

**LAKE CITY**  
**Community Hospital**

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Code of Conduct

Anne Poston  
Compliance Officer  
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