

**Cascade Medical**

**Standards of Business Conduct and Compliance**

**Message from the CEO**

I am pleased to provide you with this important outline of our Standards of Business Conduct. It’s also a guideline to help you address any concerns you may have now or in the future regarding compliance with these standards. These standards encompass many of our Shared Values and provide a framework of honesty and integrity with our peers, our managers, our patients and the public.

Our Shared Values and these guidelines provide the foundation of the expectations for which we hold ourselves and others accountable. Because this is such an important part of our day to day business, Cascade Medical has established a Compliance Program, these Standards and a Compliance Officer and committee to assist you. All employees, including contract staff, will be expected to comply fully with these standards.

The Standards displayed below may not represent every single potential area of personal accountability, but provide a broad overview of the types of Business Standards for which all employees will be held responsible.

If you have a concern about what is proper business conduct, please raise that concern to your supervisor or use one of the methods described in this document.

Thank you for your part in making Cascade Medical the best that we can be!

Diane Blake, CEO

**Cascade Medical Shared Values**

**Commitment, Community, Empowerment, Integrity, Quality, Respect, Transparency**

**Important Information for Cascade Medical Employees, Students and Volunteers**

Cascade Medical includes a wide range of services and departments with varying responsibilities and rules and regulations that impact or govern them specifically. Because of this, the landscape can be complicated and you may be uncertain as to how to react to different situations that may arise. This could include things you observe or actions you are thinking of taking.

We want to provide you with some helpful information if you are in doubt as to what to do if you perceive a situation which may be a compliance issue:

* When in doubt about whether an action may or may not be appropriate, ask for help or advice from your supervisor or any manager. Does the situation seem to be out of line with our policies, procedures, values or standards? Ask yourself if the action is legal and whether it is in line with our expectations?
* Follow the reporting process. It’s always better to raise a question before taking an action that would be improper.
* If you observe an action that you think might be a compliance issue, please follow the reporting procedures.

Process for reporting concerns

1. Enter the concern or issue into Cascade Medical’s Risk Management Data base. This program is called Quantros and there is a link provided on all facility computers. Use your windows login and password to log into the system. You may also input an anonymous report. All reports in Quantros are automatically directed to the Risk Manager.
2. Discuss the issue with your supervisor. If you are not comfortable with doing this for any reason, go to the next step.
3. Discuss the issue with the Compliance Officer. If you are not comfortable with doing this for any reason, go to the next step.
4. Discuss the issue with the any other member of the Compliance Committee, shown below. If you are not comfortable with this, go to the next step, which is either calling or emailing the Cascade Medical Compliance Hotline.

**Compliance Committee:**

Jim Hopkins – Compliance Officer Sara Leighton – HIPAA Officer

Jerri Smith Charles Amstutz

Amy Webb Kristen Mershon

Reyne Boik Kelly Allen

Call or email the Cascade Medical Compliance Hotline:

(509) 548-3426

(509) 548-5815 ext. 3678

compliance@cascademedical.org

(Please put ‘compliance’ in the subject line)

The Compliance Hotline is used to report any potentially improper action, and is intended to be used when an employee is not comfortable using any other method listed above. This Hotline is available

24/7/365.

**Standards of Business Conduct**

We will:

* Protect the confidentiality of all patient and hospital information, including information contained in all Electronic Medical Records.
* Properly and accurately enter diagnosis and coding in patient charts.
* Provide accurate accounting information to the Board of Commissioners, external auditors and governmental agencies.
* Investigate all reports of suspected or actual wrong doing and perform internal audits to track compliance to laws, regulations and Cascade Medical Standards.
* Comply with all standards established by the federal Emergency Medical Treatment and Labor Act (EMTALA). EMTALA requires us to provide an examination an needed stabilizing treatment, without consideration of insurance coverage or ability to pay when a patient presents to an Emergency Room for attention to an Emergency Medical Condition.
* Share responsibility for compliance with all Federal and State regulations.
* Contribute to the safety and health of our workplace by adhering to health and safety laws and regulations.
* Prepare and maintain all patient and hospital records accurately and retain for periods required by law and hospital policy.
* Ensure that all bills for patient services are accurate and that overpayments are refunded promptly.
* Display good judgment and high standards of ethics in our decision making process.
* Cooperate fully with government investigations and applicable.
* Represent Cascade Medical with integrity and with honesty in all marketing materials, media events or inquiries, always stressing the positive value of our services.
* Fully evaluate and disclose healthcare provider credentials accurately.
* Hold all information related to employee records, including personal, medical and training records in complete confidence with limited access only to those properly authorized to view those records.
* Report any potential issue with is not in compliance with our standards to the Compliance Office through the Compliance Hotline or in writing through the formal complaint process. In no case will the report of information be held against any employee, student or volunteer for any reason.

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