



# Code of Ethical Conduct

GraniteOne  
HEALTH  
Compliance

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## Welcome

**A message to all employees, professional staff members, volunteers, agents, consultants, and vendors, as well as medical, nursing, and other professional allied health students:** The organizations of GraniteOne Health are committed to the highest standards of business conduct and compliance with all applicable laws and regulations. Ethical, fair, and honest behavior – professionally and personally – is central to fulfilling our mission and building trust with each other and those we serve. Our values of compassion, quality, service, respect, and collaboration are all grounded in our Code of Ethical Conduct (the “Code”).

This booklet is your copy of the Code. While it does not alone define integrity or compliance, it does serve as a framework to guide all of our actions in the work environment. It is your responsibility to read, understand, and embrace these principles. The Code has been approved by the Compliance Committee of the GraniteOne Health Board of Trustees. It represents our long-term commitment to compliance and, therefore, to the quality of services we provide our patients and communities. It also reflects the respect we have for the law and for our physical and emotional work environment.

We are committed to supporting you in understanding and following this Code. If you have any questions regarding the Code, or if you encounter any situation that you may believe may violate any provision of the Code, you should immediately consult your supervisor, a member of management, or your local Compliance Office. You may also call your local compliance hotline or the GraniteOne Health Compliance Hotline at 833.COMPLYGOH. Please know that GraniteOne Health has a strict policy protecting those who report possible improper conduct in good faith – you should never fear retribution or retaliation for reporting.

It takes each and every one of us to maintain a culture of personal responsibility and accountability. I thank you for adhering to the principals set forth in this Code and for helping to support that culture.

A handwritten signature in black ink, appearing to read 'J. Pepe'.

Joseph Pepe, MD  
President & CEO, Catholic Medical Center  
CEO, GraniteOne Health

# Code of Ethical Conduct Statement

Whenever the term GraniteOne Health is used in this document, it refers to both GraniteOne Health and each of its member hospitals, including Catholic Medical Center, Huggins Hospital and Monadnock Community Hospital and all affiliated organizations.

The obligations, principles and standards discussed in this Code apply to all GraniteOne Health employees, professional staff members, volunteers, agents, consultants, and vendors, as well as medical, nursing, and other professional allied health students (collectively referred to herein as “personnel”). GraniteOne Health may change, correct, modify, or revoke any of the obligations, principles, and standards at any time with or without notice. This document is not a contract, and is not all-encompassing of all of the policies and procedures at GraniteOne Health and its member hospitals. With respect to employed personnel, nothing contained in this document is intended to create, or should be interpreted to create any additional employment rights or alter a person’s status of “employment-at-will” to any other status with the GraniteOne Health member hospital.

The Code sets forth obligations that refer to necessary behaviors that are required by the ethical foundation of GraniteOne Health’s and its member hospitals’ missions. Failure to meet these obligations, or other noncompliance with the Code and related GraniteOne Health policies and procedures, may subject you to disciplinary action, up to and including termination of employment and/or revocation of staff privileges. As part of each individual’s obligations to maintain the highest level of integrity and accountability, each individual to whom this Code applies is required to alert a supervisor, senior manager, or compliance officer of an actual or suspected violation of the Code, GraniteOne Health policies and procedures, or applicable laws and regulations.

## GraniteOne Health

### Mission

Our mission is to provide accessible, patient-centered, high quality care to our communities through exceptional collaboration and integration across the continuum of health.

### Vision

Our vision is to lead the evolution of healthcare collaboration that will define transformative, high value care.

### Values

- Compassion
- Quality
- Service
- Respect
- Collaboration

### Compliance Reporting

GraniteOne Health Compliance Hotline: 833.COMPLYGOH (833.266.7594)

# Catholic Medical Center

## Mission

The heart of Catholic Medical Center is to carry out Christ's healing ministry by offering health, healing and hope to every individual who seeks our care.

## Vision

Guided by our Mission and Values, we are committed to becoming the finest customer experience, lowest cost, and best outcome provider in the region.

## Values

- Compassion
- Human Dignity
- Excellence
- Respect
- Patient-Centered Care

## Compliance Reporting

Catholic Medical Center Compliance Hotline: 603.663.6749

In person at: 195 McGregor Street – 3rd Floor – Suite 308

Via direct dial at: 603.663.8760

# Huggins Hospital

## Mission

To empower the fulfillment of life through better health.

## Vision

Huggins will be the community's home for health and wellbeing.

## Values

- Family
- Compassion
- Excellence
- Respect
- Continuous Improvement

## Compliance Reporting

Huggins Hospital Compliance Hotline: 603.569.7451

In person at: the Clinical Services Business Manager's Office

Via direct dial at: 603.569.2065

# Monadnock Community Hospital

## Mission

We are committed to improving the health and well-being of the community we serve.

## Vision

We will elevate the health of our community by providing accessible, high quality, and value based care.

## Values

- Performance
- Respect
- Integrity
- Service
- Compassionate Care
- Collaboration
- Creativity

## Compliance Reporting

Monadnock Community Hospital Compliance Hotline: 603.924.4733

In person at: the Organizational Performance Office

Via direct dial at: 603.924.1720

## Obligations

### 1. Respect the Rights Afforded Patients

All patients shall have rights as prescribed by the New Hampshire Patients' Bill of Rights (see RSA 151:21), including but not limited to:

- Being treated with consideration, respect, and full recognition of their dignity and individuality.
- Being fully informed of their rights and responsibilities and of all procedures governing patient conduct and responsibilities.
- Being encouraged and assisted throughout their stay to exercise these rights as a patient and citizen.
- Being assured that all information contained in their record will be treated confidentially and that it will only be released with proper written consent unless otherwise required by law.
- Not being denied appropriate care on the basis of race, religion, color, national origin, sex, age, sexual orientation, disability, marital status, or source of payment

In addition, patients and their surrogate decision makers have the following responsibilities:

- Provision of Information: Patients have the responsibility to provide, to the best of their knowledge, accurate and complete information about present complaints, past illnesses, hospitalizations, medications, and other matters relating to their health.
- Compliance with Instructions: Patients are responsible for following the treatment plan recommended by the practitioner primarily responsible for their care.

- Refusal of Treatment: Patients are responsible for their actions if they refuse treatment or do not follow the practitioner's instructions.
- Hospital Charges: Patients are responsible for assuring that they meet their financial obligation for healthcare services rendered as soon as possible after discharge.
- Hospital Rules and Regulations: Patients are responsible for following hospital rules and regulations affecting patient care and conduct.
- Respect and Consideration: Patients are responsible for being considerate of the rights of other patients and hospital personnel, and for assisting in the control of noise, smoking, and the number of visitors

Note that minors, because of their age and competence, exercise their consent to treatment through their parents or legal guardian unless otherwise specified by law.

### **Q & A**

A patient is angry about their treatment. What should I do?

Patients, their family members, and/or designated health care representatives may submit complaints to any staff member. Staff members should immediately address the concern and, if unable to resolve it, alert their supervisor who will then take steps to escalate and resolve the situation. Each GraniteOne member hospital has a patient liaison to whom concerns may be escalated, and individuals also have the right to contact the NH Department of Health & Human Services and other government and accreditation agencies.

## **2. Maintain the Privacy & Security of Patient Information**

In accordance with, and pursuant to the privacy and security standards of the Health Insurance Portability and Accountability Act ("HIPAA"), all patient medical information, whether it is stored electronically or on paper, is CONFIDENTIAL and, therefore, must be protected from unauthorized use and/or disclosure.

All GraniteOne Health personnel have an obligation to protect patient medical information and be mindful that in most circumstances, medical or personal details about patients should be shared only with health care professional who have a bona fide "need to know" such information, such as members of a patient's care team or other individuals involved in the patient's care and treatment. Generally, personnel may not access a patient's medical or other personal information unless there is a professional "need to know." Each GraniteOne Health member hospital has a Notice of Privacy Practices that sets forth more details about patients' rights under HIPAA and the uses and disclosures of their information with and without patients' consent. All GraniteOne Health personnel are encouraged to review these documents, which are available on each GraniteOne Health member hospital's public website.

### **Q & A**

I just found out my friend's parent is in the hospital. My friend asked me to check on their parent's condition. I know the patient and they would not mind, so I can use my credentials to go into her record, right?

No. As an employee, you should never access a medical record unless you have a work related reason to do so. In this case, accessing any information about the patient would be a violation of GraniteOne Health policies. Furthermore, even if you were caring for the patient, unless your friend is entitled to the information, speaking to them about the patient would be a HIPAA violation.

### 3. Report Issues Affecting Patient Quality & Safety

GraniteOne Health is committed to providing patients with high-quality care in a safe and respectful environment. Everyone has a responsibility to support an environment that is continuously improving and non-punitive. It is critical to report potential hazards or adverse events at the time they are identified or occur. Each GraniteOne Health member hospital has their own reporting system and any issues should be reported using the applicable local process. However, the GraniteOne Health Compliance Hotline is available to all personnel at all times if they are uncomfortable using local processes for any reasons.

#### Q & A

My work does not involve direct patient care; therefore I am not required to report anything, correct?

No. Quality and safety are everyone's job; if you see something, say something. It could be as simple as alerting Environmental Services to a spilled cup of coffee, which avoids a slip and fall. Also, please do not assume that someone else has already reported your concern.

### 4. Comply with the Laws Governing Healthcare Services

There are certain unique federal laws that govern hospital and healthcare providers as compared to other businesses and industries. It is important that all GraniteOne Health personnel are aware of these laws and play their part to comply.

#### **EMTALA**

The Emergency Medical Treatment and Active Labor Act ("EMTALA" is the federal "anti-dumping" law, intended to ensure public access to emergency services regardless of ability to pay. EMTALA requires hospitals that offer emergency services, which each GraniteOne Health member hospital does, to provide a medical screening examination when a request is made for examination or treatment for an emergency medical condition, including active labor, regardless of an individual's ability to pay. Hospitals are also required to provide stabilizing treatment or an appropriate transfer for patients with emergency medical conditions. In addition, hospitals must maintain a physician on-call system to provide available coverage to assist in stabilizing patients. Hospitals can be subject to civil monetary penalties for each violation as well as possible termination of their Medicare provider agreement.

#### Q & A

When does EMTALA apply?

EMTALA applies when a patient presents to the hospital and lasts until the patient is stabilized in the Emergency Department, appropriately admitted as an inpatient, or properly transferred.

#### ***The Federal False Claims Act***

The Federal False Claim Act is a statute that imposes civil liability on any person or entity who:

- Knowingly submits a false claim to the federal government for payment.
- Knowingly makes or uses a false record or statement to obtain payment or approval of a claim by the federal government.
- Uses a false statement to decrease an obligation to the government.



If convicted of a False Claims Act violation, the Office of Inspector General (“OIG”) may seek to exclude the provider from participation in federal healthcare programs. Such exclusion means that the provider may not treat, or bill for, Medicare and Medicaid patients

#### **Q & A**

A provider asked me to bill an insurance company for services that were not provided. What should I do?

Please decline and seek support from a supervisor. Do not create an erroneous charge that would lead to an erroneous bill. You are being asked to commit fraud, and you should immediately notify your supervisor, a senior leader or the Compliance Office.

### ***Medicare Anti-Kickback Statute***

The Medicare Anti-Kickback Statute, or “anti-bribery law,” makes it a violation to offer or accept something of value, directly or indirectly, in exchange for the referral of any Medicare business unless it falls within certain exceptions, known as “safe harbors,” specified under federal laws. The underlying purpose is to guard against improper influence over choice of the provider or supplier who will furnish items or services. It equally guards against the overutilization or inappropriate utilization of items or services and the resulting negative impact on program costs and the quality of care. Due to the complexity of this law, you should refer any questions or concerns related to a specific transaction to the Compliance Office.

### ***Stark Law***

The Stark Law, or federal physician self-referral law, removes incentives to overuse medical care that may result if a physician’s treatment decisions are tied to financial gain. The law’s purpose is to prohibit a physician from referring a patient for designated health services to any entity with which either the physician or a member of his or her family has a financial relationship. There are some exceptions to this law, such as for physician employment. Please contact the Compliance Office with any questions or concerns.

#### **Q & A**

I overheard an employee discussing a “handshake” deal with an independent physician group to refer patients to the hospital in exchange for increased referrals to their group. Is there any concern with this arrangement?

Most likely, yes. More information is necessary in order to determine whether the arrangement can fit under any of the safe harbors of the Anti-Kickback Statute or exceptions to the Stark law. However, you should report this information to your supervisor, a senior leader, or the Compliance Office to do further investigation.

## **5. Maintain Ethical Relationships**

### ***Conflicts of Interest***

A conflict of interest is a situation in which an individual or a member of his or her immediate family is in a position to benefit personally or materially, either directly or indirectly, through business or investment, from that individual’s relationship with a GraniteOne Health or GraniteOne Health member hospital. The conflict does not have to be real; it can be a potential or an apparent conflict, including an opportunity for improper benefit. It is the responsibility of employees, and other personnel, to make full disclosure of any interest that might result in a conflict on his/her part. Please consult the Compliance Office with any questions.

### **Q & A**

My spouse is the local sales representative for a medical device supplier that does business with a GraniteOne Health member hospital. Is this a relationship that I need to disclose?

Maybe. The answer depends upon the role you play within your organization. If your role involves purchasing items that this vendor sells, then you absolutely must disclose this relationship to your supervisor. However, if your role is not management level or above and does not involve the purchase of items from this vendor, then a disclosure is not required. That being said, it's better to err on the side of caution and over disclose.

### **Gifts**

Vendors and referral sources frequently cultivate relationships with providers and others in a position to generate business for them through a variety of practices, including gifts, entertainment, and personal services compensation arrangements. These activities have a high potential for fraud and abuse and, historically, have generated a substantial number of Anti-Kickback statute convictions. Pursuant to these laws, individuals must not accept any gifts or services, regardless of their value, from a vendor or referral source if the purpose of offering or providing such a gift or service is to induce or reward referrals. Furthermore, GraniteOne Health seeks to manage its relationships with all parties in a fair and reasonable manner, consistent with all applicable laws and good business practices. As a general rule, personnel shall not accept gifts from vendors or referral sources, patients, or other third parties.

### **Q & A**

A pharmaceutical sales representative is offering members of our department free admission passes to an upcoming conference. We planned to attend the conference before learning of this offer; therefore it's ok to accept these passes in lieu of using funds from our department's budget, right?

No. You may not accept the passes to the conference, despite the fact you intended to attend prior to the offer. This gift from the vendor could potentially be considered a kickback. Consult your supervisor or the Compliance Office with any questions.

## **6. Follow Rules on Lobbying and Political Contributions**

Federal and State laws restrict the use of corporate assets and govern activities of non-profits entities, such as GraniteOne Health and GraniteOne Health member hospitals, in connection with elections. Any individual personally may support a political campaign or engage in lobbying, but only on his or her own time, and without identifying their respective GraniteOne Health member hospital in connection with such activities. Additionally, no personnel should use GraniteOne Health phones or e-mail systems for political solicitations.

### **Q & A**

A medical staff member requested that I work with the medical staff office to distribute flyers for a candidate who is supportive of hospitals and health care. Is this okay?

No. It is not appropriate to use any GraniteOne Health or Granite One Health member hospital resources to endorse, or otherwise support, a single candidate. Occasionally, a hospital may host events involving governmental officials, such as a legislative breakfast, but it is important that all officials, or candidates in cases related to elections, have an equal opportunity to attend. Offering free meeting space to an elected individual or an individual running for office is not permissible without express approval from the Compliance Office.

## 7. Promote Diversity, Equal Opportunity & Respect in the Workplace

All GraniteOne Health member hospitals provide a workplace that practices non-discrimination and equal opportunity. Accordingly, all personnel should respect the diverse opinions, beliefs, and cultural differences of patients, staff and visitors. You must maintain dignity for others at all times and treat those whom you serve, with whom you work, and the public with respect at all times. It is never acceptable to use discriminatory, harassing, hostile, or profane language, verbally or in writing. All personnel shall help promote an atmosphere where disagreement in the workplace can be discussed and resolved in a professional manner.

### Q & A

I'm uncomfortable with several comments that I've heard my supervisor make to one of my colleagues, but she hasn't done anything about it. Should I not as well?

No. Please speak up and report your concerns to the next person in your chain of command, your local Human Resources Department, or your local Compliance Department. You may also use the GraniteOne Health compliance hotline if for any reason you don't feel comfortable with your local reporting options. It is important that even if you just observe inappropriate conduct, and do not experience yourself, you report it to an appropriate person for further assistance.

## 8. Protect our Resources and Practice Financial Responsibility

All personnel should make prudent and effective use of GraniteOne Health, and their respective GraniteOne Health member hospital's, assets and resources, including time, supplies, equipment, space, and information. Personnel are responsible for ensuring that assets and resources such as telephones, computers, copiers, and equipment are not improperly or unreasonably used. Additionally, you are responsible for protecting confidential business information; do not disclose confidential, non-public information about GraniteOne Health and GraniteOne health member hospitals, that you receive or have access to in your role, unless such disclosure is part of your job duties. Any use of GraniteOne Health assets, resources, or information for personal financial gain is strictly prohibited.

### Q & A

I volunteer at a local charity, is it ok to use my computer during my lunch hour to type a flyer for their upcoming benefit gala and then print out copies?

No. Despite the fact that this is being done on behalf of a charity, during your free time, GraniteOne Health resources should not be used for non-business purposes.

## 9. Adhere to the Ethical and Religious Directives for Catholic Healthcare Services (for Catholic Medical Center personnel only)

As employees, physicians, volunteers, and board members of a Catholic hospital, personnel at Catholic Medical Center are responsible for adhering to the Ethical and Religious Directives for Catholic Health Care Services ("ERDs"). These ERDs are an expression of the magisterial teaching of the United States Conference of Catholic Bishops. The purpose of these ERDs is twofold: (1) to reaffirm the ethical standards of behavior in health care that flow from the Roman Catholic Church's teaching about the dignity of the human person, and (2) to provide authoritative guidance on certain moral issues that face Catholic health care today. They provide standards and guidance on such issues as: the social responsibility of catholic health care services; pastoral and spiritual care; professional-patient relationship; care for the beginning of life; care for the dying; and forming new partnerships with health care organizations and providers. If you would like a copy of the ERDs, please contact Catholic Medical Center's Director of the Office of Catholic Identity at 603.663.6440.

Anyone who suspects that Catholic Medical Center is not adhering to the ERDs shall notify the Catholic Medical Center Corporate Compliance Office or the Director of the Office of Catholic Identity.

## 10. Report Compliance Concerns and Enforce the Code of Ethical Conduct

GraniteOne Health strives to promote a culture with high standards of ethical and legal conduct. As set forth more specifically in the GraniteOne Health Reporting & Non-Retaliation Policy, personnel have the affirmative duty to promptly report to their supervisor or to the Compliance Office actual or potential wrongdoing, including an actual or potential violation of law, regulation, policy, procedure, or the this GraniteOne Health Code.

Personnel may report at the local level hospital or at the GraniteOne Health level. The options for reporting are as follows:

### **GraniteOne Health**

Compliance Hotline:  
833.COMPLYGOH (833.266.7594)

### **Catholic Medical Center**

Compliance Hotline: 603.663.6749  
In person at: the Compliance Office  
at 195 McGregor Street  
Via direct dial at: 603-663-8760

### **Huggins Hospital**

Compliance Hotline:  
603.569.7451  
In person at:  
the Clinical Services  
Business Manager's  
Office  
Via direct dial at:  
603.569.2065

### **Monadnock Community Hospital**

Compliance Hotline:  
603.924.4733  
In person at: the  
Organizational  
Performance Office  
Via direct dial at:  
603.924.1720

GraniteOne Health shall not permit retaliation against personnel reporting alleged violations, including, for example:

- Exercising any right under, or participating in, any process established by federal, state, or local, law, regulations, or policy;
- Filing a complaint with a GraniteOne Health member hospital and/or the Department of Health and Human Services or other government agency;
- Testifying, assisting, or participating in an investigation, compliance review, proceeding, or hearing;
- Opposing in good faith any act or practice made unlawful by federal, state, or local law, regulation, or policy, provided that the manner of the opposition is reasonable and does not itself violate law.

Personnel who, in good faith, report an actual or potential violation of law, regulation, policy, procedure, or this Code of Ethical Conduct will not be subjected to retaliation, retribution or harassment. No supervisor, manager or employee is permitted to engage in retaliation, retribution or any form of harassment against any personnel for reporting a compliance related concern. Any supervisor, manager or employee who conducts or condones retribution, retaliation or harassment in any way will be subject to discipline, up to and including termination

### **Q & A**

I reported a compliance concern, specifically a billing issue. Shortly thereafter, I received several reprimands from my supervisor for tardiness, although I'm just a few minutes late. This has never been an issue, and I feel like it is being brought up now in retaliation for making a report. What should I do?

You should reach out to your local hospital's Compliance Office. Alternatively, you may also contact the GraniteOne Health Compliance Office via the compliance hotline. Remember, personnel are not permitted to engage in retaliation, and all reports alleging retaliation are promptly investigated.