

CATSKILL REGIONAL MEDICAL CENTER CODE OF CONDUCT AND COMPLIANCE PROCEDURES SUMMARY

Introduction

Greater Hudson Valley Health System, comprised of Catskill Regional Medical Center and Orange Regional Medical Center (“the Hospital”), aspires to the highest ethical standards of conduct. This is essential to our mission.

The code of conduct is a critical component of our overall Compliance Program, and all Hospital employees, physicians, volunteers, vendors and other persons affiliated or doing business with the Hospital are expected to comply.

Principles of Conduct

The foremost principle guiding the Hospital in all of our activities is to ***Do The Right Thing***. We strive to conduct all of our activities with integrity and honesty and in accordance with applicable laws, regulations, and policies. As part of the Hospital’s commitment to Corporate Compliance, the Board of Directors has designated a Compliance Committee of the Board, which coordinates CRMC’s and ORMC’s Compliance activities through a Chief Compliance Officer. Our success depends in large measure on the trust that our patients, government regulators and the public place in us. Our Compliance Program helps to ensure that we are living up to this reputation, and continue to earn that trust.

All personnel (including employees, management, physicians, consultants and other agents) are required to comply with the Hospital’s Corporate Compliance Program. The Hospital and all of its personnel shall also comply with all Federal and New York State laws, including False Claims laws that apply to the Hospital’s operations. A summary of the federal and state false claims laws, as well as a summary of federal and state whistleblower protection laws, are summarized in the Hospital’s Policies and Compliance plan. Copies of these documents are available to any employee upon request from the Compliance Department.

Those acting on behalf of the Hospital have a duty to conduct themselves in a manner that will maintain and strengthen the public’s trust and confidence in the integrity of the Hospital and take no actions incompatible with their obligations to the Hospital. With regard to professional conduct, those acting on behalf of the Hospital should practice:

- Integrity - by maintaining ongoing dedication to honesty and responsibility, and doing “the Right Thing”;
- Stewardship - by exercising custodial responsibility for our intellectual, financial, material, and human resources;
- Compliance - by following Federal and State laws and regulations, and Hospital policies and procedures related to their duties and responsibilities;
- Confidentiality - by protecting the integrity and security of the Hospital information such as patient records, employee files, and other confidential information;
- Reporting any activity reasonably believed to violate Federal or State laws or regulations or Hospital policies or procedures.

Reporting Suspected Violations

The Hospital has a non-retaliation policy for personnel who raise compliance concerns or who report known or suspected violations of the Corporate Compliance Program or of federal or state laws. Concerns or reports about suspected violations can be made anonymously. Personnel are also afforded protection by law for reporting known or suspected violations of Federal and New York State false claims laws and regulations. You are required to report any activity reasonably believed to be in violation of law, regulation, or policy to your Supervisor, anyone in management, the Human Resources staff, the Compliance Officer, or the Anonymous Compliance Hotline Number: **(888)-846-5945** or log on to AlertLine at: <https://crmcny.alertline.com> .

CROSS REFERENCES:

Compliance Auditing and Monitoring Policy
Compliance investigations Policy
Conflict of Interest Policy
Ethical Code of Behavior Policy
Hotline Operations Policy
Whistleblower Policy
Non-retaliation Policy
Compliance Plan



We Do the right thing!