

Policies and Procedures: WVUPC Code of Conduct

Section: Compliance
Chapter: Administration
Policy: Code of Conduct: Education and Certification

I. PURPOSE

To establish a policy which relates to the mandatory education of all WVUPC employees and associates regarding the WVUPC Code of Conduct, and the written certification from all such individuals regarding their receipt, understanding, and agreement to abide by the Code of Conduct's provisions.

II. APPLICABILITY

This policy applies to all WVUPC employees, officers, directors, and to all other persons who provide patient care items or services, or who perform billing or coding functions on behalf of WVUPC.

III. STATEMENT OF POLICY

WVUPC is committed to the highest standards of professional ethics and to compliance with all applicable laws and regulations. The Board of Directors of WVUPC has, therefore, adopted a voluntary corporate Compliance Plan in order to provide compliance assistance and guidance to our employees and associates in order to ensure that our work and the mission of our organization is pursued in an ethical and legally appropriate manner.

A key part of the WVUPC Compliance Plan is our Code of Conduct, a document which is intended to set forth a non-exclusive summary of guidelines regarding the ethical and legal standards which all of our employees and associates are expected to follow whenever performing services for or on behalf of our organization. All newly hired employees shall receive a copy of our Code of Conduct, and shall be provided instruction relating to its provisions within 30 days of their date of hire. All employees must provide the corporation with written or electronic certification of their receipt of the Code of Conduct and their agreement to abide by its provisions as a condition of employment.

All other covered persons, as that term has been defined by the Corporate Integrity Agreement entered into by and between WVUPC and the Office of Inspector General ("OIG") on January 27, 2006, shall be provided a copy of the WVUPC Code of Conduct and related instruction, and shall provide the corporation with written or electronic certification of their receipt of the Code of Conduct, and of their understanding of and

agreement to abide by its provisions, no later than 30 days after becoming such a covered person.

IV. PROCEDURE

1. All employees, officers, directors and other persons who perform patient care services and/or billing or coding functions on behalf of WVUPC shall receive a copy of the WVUPC Code of Conduct within 30 days of hire or within 30 days of becoming a “covered person” within the meaning of the Corporate Integrity Agreement (CIA) entered into by and between WVUPC and the Office of Inspector General (OIG) of the United States Department of Health & Human Services. The WVUPC Compliance Officer or his/her designee shall, in cooperation and collaboration with the Department of Human Resources and with the Practice Administrators of each clinical department of WVUPC, ensure that this Code of Conduct instruction is timely provided to all relevant individuals.
2. Each person who is required to receive the Code of Conduct as set forth in IV.1 above shall provide written or electronic certification of their receipt of the WVUPC Code of Conduct, of their understanding of its provisions, and of their agreement to abide by the Code as a condition of employment or of doing business with WVUPC. WVUPC’s Compliance Officer or his/her designee shall maintain records of all such certifications for the period required by the CIA.
3. Adherence to the WVUPC Code of Conduct, and with corporate compliance initiatives generally, shall be an element in the performance evaluation for all WVUPC employees.
4. The WVUPC Code of Conduct is intended to set forth our corporation’s commitment to:
 - a. Full compliance with all federal health care program requirements, including those relating to accurate claim submission;
 - b. Ensuring that all of our covered persons as defined by the terms of our CIA understand that they are expected to comply with all federal health care program requirements and with all relevant corporate policies and procedures relating to such compliance.
 - c. Ensuring that all of our covered persons understand that they are expected to report to the Compliance Officer or his/her designee any suspected violations of any federal health care program requirements, or of WVUPC’s own compliance related policies and procedures.
 - d. Providing disciplinary ramifications to both WVUPC employees and to our other relevant covered persons for failure to comply with federal health care program requirements or with WVUPC’s own compliance related policies and procedures, and for failure to report such non-compliance.
 - e. Ensuring the right of all individuals to utilize the disclosure program which has been established by WVUPC for the reporting, on an anonymous basis if preferred, known or suspected compliance violations.

- f. Ensuring that there shall be no retaliation, retribution or other form of punishment for any good faith reporting of compliance concerns or issues.
- g. Ensuring the protection and preservation of anonymity of compliance related disclosures whenever such anonymity has been requested by the reporting individual, subject to applicable parameters of the law.

5. WVUPC shall periodically review its Code of Conduct to determine if revisions to the document are appropriate, and shall make all such necessary revisions based upon such periodic reviews. Any revised Code of Conduct shall be distributed within 30 days of the finalization of such revisions. Each employee and covered person shall certify, in writing or electronically, that he/she has received, read, understood, and agrees to abide by all revisions of the Code of Conduct within 30 days after its distribution.

V. Amendment or Termination of this Policy

This policy may be amended or terminated at any time.

VI. References

- Corporate Integrity Agreement dated January 27, 2006.
- Section II of the WVUPC Compliance Plan (Code of Conduct)