POLICY STATEMENT

High Peaks Hospice (HPH) is committed to ethical behavior in all business practices. These practices include, but are not limited to marketing, admission, transfer, discharge, billing, purchasing and contractual relationships between HPH and its employees and volunteers, physicians, other healthcare providers, vendors, educational institutions, payers, and the community we serve.

PREAMBLE

Society grants the practitioners and providers of healthcare services special status, privileges and power because of the specialized knowledge they must have. In exchange, healthcare professionals are expected to assume certain responsibilities and obligations and live up to certain standards of behavior. This implicit, and sometimes explicit, agreement about the mutual expectations between professionals and society form a “covenant of trust”. A Code of Ethical Behavior is one way that this covenant is articulated.

The Board of Directors of HPH has developed this statement of organizational ethics in recognition of HPH’s healthcare professionals’ responsibility to attend to the health care needs in the communities we serve. These needs include appropriate and reasonable measures to prevent serious illness or injury to the healthy, to cure or alleviate the suffering of the sick, and to comfort the dying. It is our responsibility to administer and use wisely the physical, technological, financial, and human resources for meeting these needs. It is also our responsibility to continue to educate, to conduct research, and to advance science so that the quality of care and the efficacy and efficiency with which resources are used can be improved over time. Finally, it is our responsibility to educate the public as to its health care responsibilities and to work toward the effecting of policies which will enable quality health care.

It is our belief that an ethic that will be most helpful to us as health care providers in our difficult daily decisions is a social ethic that situates individual choices within consideration of the common good.

It is the responsibility of every member of HPH’s community – governing board members, executive and management leaders, medical and clinical staff members,
all employees and volunteers — to act in a manner that is consistent with this Code of Ethical Behavior.

ETHICAL PRINCIPLES AND ORGANIZATIONAL VALUES

The values and principles that we regard as the basis for ethical decision making by healthcare professionals of HPH are the following:

1. Compassion and Respect for Human Dignity
   A dedication to the value that all persons who are served by HPH: patients, employees, volunteers, physicians, and visitors deserve to be treated with respect for their human dignity. This respect for the dignity of the human person is fundamental to compassion, honesty, integrity and confidentiality. HPH constantly strives to adhere to these values and prizes the social covenant, which affirms that patient care is the primary goal and responsibility of HPH, and that access to basic health care is a right of the individuals of our community.

2. Commitment to Professional Competence
   Individual practitioners, as well as the Board of Directors, executives, and management of HPH, have an obligation to continue their education and familiarize themselves with the requirements of “best practice” in their fields. The community’s covenant with HPH requires efficient, flexible and realistically designed systems that promote ethical practices in reimbursement and billing practices, reporting requirements, and marketing services.

3. Commitment to a Spirit of Service to the Community
   HPH’s healthcare professionals exercise their responsibility to the community we serve by providing uncompensated or reduced-fee service to the poor and by working for public policies that enable poor or uninsured people to receive adequate health care.

4. Honesty and Integrity
   HPH fosters a culture, which encourages truthful reporting of all relevant information about a patient’s condition, appropriate treatments and their associated cost to the patient or designated surrogate. Our professional obligation extends to the keeping of patient records and to providing truthful and accurate information on official documents required by third party payers.

5. Confidentiality
   Healthcare professionals should not divulge details of a patient’s condition without permission, except as required by law. Patients entering HPH’s system should be informed about what information is recorded, how it is used, who will have access to the information, and what these practices may mean to the patient.

6. Good Stewardship and Careful Administration
Healthcare professionals have a primary obligation to work for the best interests of patients. They must be mindful, also, of their responsibilities as stewards of the common resources used to care for all of the patients in the community that HPH serves. Good stewardship requires that professionals think carefully about the relative costs and benefits of alternative therapies and courses of treatment for their patients, counsel their patients about the costs and benefits, and, if necessary, work with third party payers to encourage the use of treatments and practices that are the most cost effective.

The management and staff of HPH are accountable to the community for the efficient operation of the hospice systems, which promote quality care. They are responsible for financial accounting, providing useful and accurate information about services, costs and patient outcomes to physicians, patients, third-party payers, managed care providers, and government regulators. Such information is necessary for billing, for performance improvement programs, for negotiations over prices, and for external relations such as advertising, marketing or fund raising.

7. Conflict of Interest
Each person avoids actual, potential, or the appearance of conflict of interest in those situations in which a person has the potential to direct or influence a decision to his or her own gain. Any person having an investment, financial interest or compensation relationship, direct or indirect with any supplier, client or competitor, makes prompt disclosure to HPH and seeks evaluation for participation in the transaction. Each person neither solicits nor accepts any monetary gratuity or any personal gift of value.

8. Marketing
All internal and external marketing communications of the HPH are guided by fairness, honesty and accuracy, respect for the dignity, integrity and privacy of each individual, sensitivity to the emotional, spiritual and physical needs of the communities we serve, and a commitment to deliver all that we promise.

9. Admission, Discharge, Transfer
The decision to admit, transfer, and discharge patients is based solely on the best interest of the patient to insure treatment which is appropriate to the patient’s needs and therapeutic goals.

10. Commitment to Fair, Consistent and Compassionate Billing Practices
HPH deals with all payers, e.g. self-pay, insurance companies, HMO’s, PPO’s, Medicare and Medicaid. Accurate and prompt billing practices are maintained and all billing issues are resolved according to organizational policies and payer contracts.

The Business Office has procedures in effect to operationalize our fiduciary responsibility while being mindful of protecting the patients’ financial positions.
Management periodically reviews overall gross charges. Processes are in place to insure that billed charges are correct and consistent with the charge policy. Gross charges are standard as all patients are billed equally for healthcare services rendered. Billing practices are uniform and consistent for all patients regardless of payer source or type of health care service rendered. Knowledgeable staff is available to discuss the patients’ billing concerns and adequate and consistent time frames are allotted to address patients’ concerns. All financial transactions are performed in accordance with applicable federal and state regulations.

We are mindful of protecting the patient’s financial position. We attempt to identify issues that may negatively impact the service coverage for the patient and we assist in the patient’s appeal process for benefits. We look to all available sources of coverage for medical care and assist the individual in the application process for Medicaid.

11. Individual Responsibility
The integrity of HPH is diminished when any ethical standard is not maintained. HPH expects every person to abide by these standards and encourage their maintenance.

RELATED DOCUMENTS
The following related documents (Policy Number in parentheses) provide further and specific guidance for ethical conduct at HPH.

- Advance Directives (CP204)
- Confidentiality of Information (CP212)
- Conflict of Interest (HPH147)
- Do Not Resuscitate (CP221)
- Ethical Issues: Consultation & Resolution (CP225)
- Life Sustaining Treatment: Guidelines Regarding Decisions to Give, Withhold or Terminate (CP235)
- Marketing Materials (HPH129)
- Notice of Privacy Practices (Privacy 100)
- Patient Billing for Hospice Services (CP252)
- Patient/Family Bill of Rights (CP246)
- Patient/Family Informed Consent (CP248)
- Patient Responsibilities (CP249)
- Scope of Services – Social Work with Ethical Code of Professional Associations (CP262)
- Standards of Conduct (HPH141)
- Staffing Management (HPH140)
- Verbal/Non-Verbal Abuse and Sexual Harassment (HPH144)