



Clifton-Fine Hospital (CFH) is committed to conducting its business ethically and in conformance with all federal and state laws, regulations, and facility policies. CFH is committed to preventing the occurrence of unethical or unlawful behavior, stopping such behavior as soon as possible after discovery, and allowing for termination of agreements/contracts for failure to adhere to this Code of Conduct.

**ETHICS:** CFH strives to deliver quality services, and conduct all service provision in an ethical and legal manner. *You are expected* to record all services or transactions accurately and to function with honesty in your work.

**CONFLICT OF INTEREST:** Placing business with any firm in which there is a family relationship may constitute a conflict of interest. Advance disclosure and approval are required. *You must promptly report* any actual or potential conflicts of interest.

**EMPLOYMENT ENVIRONMENT:** CFH is committed to creating a safe and professional workplace where all are treated with respect. *You are required* to support CFH's commitment to a safe, professional, and drug-free work environment, refrain from discrimination, harassment and retaliation, refrain from joking about another's race, gender, age, religion, national origin, color, marital status, disability, sexual orientation or other protected characteristics.

**DOCUMENTATION:** You must document accurately and honestly, and only for those services that you provide. All documentation shall be accurate, legible, complete, and filed on time. *You must not* omit or conceal any relevant information, make any false entries in any of CFH's records or in any public record for any reason, create or participate in the creation of any records that are intended to mislead or to conceal anything that is improper, falsify records that are used for the basis of submitting claims, document services not rendered.

**PROTECTION OF CONFIDENTIAL INFORMATION:** The protection of confidential business, staff and patient information is very important. *You must not* discuss CFH information, purposefully or through casual conversation to any unauthorized person inside or outside CFH or remove confidential information from CFH's property.

**FAIR DEALING:** CFH will not pursue any business opportunity that requires engaging in unethical or illegal activity. Kickbacks and rebates in cash, credit or other form are prohibited. *You must not* accept or solicit money, gifts or any other personal benefits or favors of any kind, offer or accept gifts or entertainment that is primarily intended to gain favor or to influence a business decision.

**FEDERAL AND STATE PROGRAMS:** CFH is committed to preventing fraud, waste and abuse of state and federal funding. All contractors will be screened to ensure they are not excluded/sanctioned from NYS OMIG or Centers for Medicare and Medicaid Services (CMS). Exclusion means that no payments can be made to the excluded entity. CFH will withdraw or terminate contracts/agreement with any excluded individual or entity. The following sites will be queried monthly: System for Awards Management, Office of Inspector General, and Office of Medicaid Inspector General. *You must promptly report* any sanctions and involvement in non-compliant activities including health care related crimes and fraud against local, state or federal government.

**REPORTING VIOLATIONS:** *You must promptly report* actual or suspected violations of this Code of Conduct. CFH will not tolerate any form of retaliation against a person who makes a good-faith report. Full and honest cooperation is expected in any investigation into a reported violation. **COMPLIANCE REPORTING HOTLINE: 315-848-8010**

Business Name (printed):

Signatory Name (printed):

Signature:

Date: