



**Harrison County  
Community Hospital  
District**

**COMPLIANCE PLAN  
2025**

---

## COMPLIANCE PROGRAM: PURPOSE AND OVERVIEW

---

Harrison County Community Hospital District (HCCH), its Board of Directors, and its administration are committed to quality and efficient patient care; high standards of ethical, professional and business conduct; and full compliance with all applicable federal and state laws affecting the delivery or payment of health care, including those that prohibit fraud and abuse or waste of health care resources.

The purpose of this Compliance Program and its component policies and procedures is to establish and maintain a culture within HCCH that promotes quality and efficient patient care; high standards of ethical and business conduct; and the prevention, detection and resolution of conduct that does not conform to HCCH's standards and policies, applicable law, and health care program or payor requirements. The Compliance Program applies to all HCCH personnel, including but not limited to its Board of Directors, administration, physicians and other practitioners, employees, volunteers, and other entities providing services on behalf of HCCH. The Compliance Program includes the following elements:

1. Written standards, policies and procedures which promote HCCH's commitment to compliance with applicable laws and regulations.
2. The designation of a Compliance Officer and Compliance Committee charged with the responsibility of implementing and monitoring the Compliance Program.
3. Regular, effective education and training programs for all affected HCCH personnel as appropriate to their functions.
4. A process to receive complaints concerning possible Compliance Program violations, procedures to protect the anonymity of complainants to the extent possible, and policies that protect complainants from retaliation.
5. A process to respond to allegations of improper activities and the enforcement of appropriate disciplinary action against HCCH personnel who have violated HCCH policies, laws, regulations, or health care program requirements.
6. Periodic audits or other methods to monitor compliance and assist in the reduction of problems in any identified areas.
7. A process for investigating and resolving any identified problems.

As demonstrated by the signatures below, the **Compliance Program** is enacted at the direction and with the support of the Board of Directors, administration, and medical staff.


APPROVED BY:

  
Chairman, Board of Directors

01/27/25  
Date

  
Chief Executive Officer

01/27/25  
Date

  
Compliance Officer

1-8-25  
Date



# CODE *of* CONDUCT

## Purpose

This Code of Conduct has been adopted by the Harrison County Community Hospital District (HCCH) Board of Directors to provide standards by which employees of HCCH will conduct themselves to protect and promote organization-wide integrity and to enhance HCCH's ability to achieve the organization's mission.

## Introduction

HCCH's Code of Conduct sets forth the principles of ethical and moral conduct for all persons engaged in caring for the health of our patients. HCCH's mission includes Harrison County Community Hospital, HCCH Medical Group and any current and future entities owed by HCCH. All board members, HCCH employees, medical staff and others engaged in services of HCCH are expected to act in accordance with the following principles of conduct:

- ① Comply with laws, regulations, and policies,
- ② Act in good faith and honesty in business transactions,
- ③ Maintain confidentiality,
- ④ Avoid conflicts of interest,
- ⑤ Be a good steward of HCCH assets,
- ⑥ Professional Conduct

As used in this Code of Conduct, the term "HCCH" refers to the Harrison County Community Hospital District and each of its departments or business areas. The terms "officer," "director," "manager" and "employee" include any person who fills such a role or provides services on behalf of HCCH or any of its departments or business areas.

## ① Comply with Laws, Regulations and Policies

---

You are responsible for performing HCCH activities in compliance with applicable laws, regulations, and policies. The following are examples of legal requirements that apply to HCCH. They do not cover every situation you may encounter. You are required to comply with all applicable laws, whether they are specifically addressed in these policies. If questions regarding the existence of, interpretation or application of any law arise, they should be directed to Administration or the Compliance Officer.

### **Antitrust**

You must comply with applicable antitrust and similar laws which regulate competition. Examples of conduct prohibited by the laws include (1) agreements to fix prices, bid rigging, collusion (including price sharing) with competitors; (2) boycotts, certain exclusive dealing, and price discrimination agreements; and (3) unfair trade practices including bribery, misappropriation of trade secrets, deception, intimidation, and similar unfair practices.

### **Anti-Kickback Law**

Kickbacks are gifts, entertainment, or anything else of value given to or from a person or company with an expectation or hope that it will result in referrals of patients or prescribing or ordering of items or services paid for by a government program.

- The Anti-Kickback statute prohibits offering or receiving, directly or indirectly, remuneration (anything of value) to induce, or in exchange for, a referral of federal health care program business – patients, items, or services.
- All employees are responsible for recognizing gifts or other benefits that may violate the Anti-Kickback Law and may not offer or receive those items or services. (See also: *Gifts, Gratuities and Entertainment*, page 4.)

### **Coding and Billing Rules**

HCCH is committed to submitting accurate, complete, and timely claims for payment. Employees responsible for creating charges, including clinical, billing, coding, and health information management personnel, must use due care that all claims are accurate and in compliance with applicable federal and state billing requirements. Bills must be submitted only for services provided and appropriately documented. Inaccurate, false, or fraudulent claims could subject HCCH to prosecution, refunds and/or penalties.

### **Environmental Responsibility**

It is the policy of HCCH to manage and operate its business in the manner which respects our environment and conserves natural resources. You are expected to utilize resources appropriately and efficiently, and to otherwise dispose of all medical waste and hazardous materials in accordance with applicable laws and regulations, and to work cooperatively with the appropriate authorities to remedy any environmental contamination for which HCCH may be responsible.

### **Excluded Individuals and Entities**

HCCH does not knowingly employ, do business with or contract with an individual or entity that is excluded from participation in government health care programs. HCCH regularly searches the Employee Disqualification List (EDL). You are required to notify HCCH if an individual or entity associated with HCCH becomes excluded, debarred, or ineligible to participate in government health care programs.

### **False Claims Act**

Federal and state False Claims Acts (FCA) prohibit anyone from knowingly making, presenting, or causing to be presented a false record or statement to obtain payment from a government program or conspiring to defraud any government program to get a claim paid or approved. “Knowingly” means that the person or organization.

- knows the record or claim is false, or
- seeks payment while ignoring whether the record or claim is false, or
- seeks payment recklessly without caring whether the claim is false.

A few examples of false claims include someone knowingly billing Medicare for services that were not provided or were not medically necessary; falsifying certificates of medical necessity; unbundling or billing separately for services that should be billed as one service; creating false medical records or treatment plans to increase payments; failing to report or refund overpayments or credit balances; and physicians billing without personal involvement for services rendered by students or a mid-level provider. Under certain circumstances, an inaccurate Medicare, Medicaid, VA or Federal Employee Health Plan claim could become a False Claim. See *Missouri Health Care Payment Fraud and Abuse Act: V.A.M.S. §191.905*

### ***Tax***

As a governmental nonprofit entity, HCCH has a legal and ethical obligation to act in compliance with applicable laws, to engage in activities in furtherance of its charitable purpose, and to ensure that its resources are used in a manner which furthers the public good rather than the private or personal interests of any individual. Consequently, HCCH and its employees will avoid compensation arrangements in excess of fair market value, will accurately report payments to appropriate taxing authorities, and will file all tax and information returns in a manner consistent with applicable laws.

### ***Political Activity***

As a governmental nonprofit entity, HCCH must comply with certain Internal Revenue Service restrictions on political activities. While we engage in many advocacy efforts, there are limits to our political activities.

Some examples of activities in which HCCH **may not** be involved:

- Sponsoring fundraising events to support a candidate for public office,
- Contributing HCCH funds to a candidate for public office,
- Opposing or supporting a candidate for public office,
- Contributing HCCH funds to a political action committee (PAC) or political party,
- Using HCCH resources to oppose or support a candidate for public office,

Activities that **are permitted** include:

- Calling and/or writing elected officials, legislators, and representatives of government agencies to express a view on an issue.
- Visiting political leaders to provide HCCH's perspective on proposed legislation.
- Facilitating public forums or debates to raise awareness of issues and inform voters on the impact of proposed legislation on the community.
- As an individual, you may make political contributions at your own expense or participate in political campaigns on your own time.



## ② Act in Good Faith and Honesty in Business Transactions

---

You are required to represent HCCH accurately and honestly and not engage in any activity or scheme intended to defraud anyone of money, property, or honest services.

### ***Honest Communication***

HCCH requires candor and honesty from individuals in the performance of their responsibilities and in communication with our attorneys and auditors. You shall not make false or misleading statements to any patient, person or entity doing business with HCCH about other patients, persons or entities doing business or competing with HCCH, or about the products or services of HCCH or its competitors.

### ***Copyrighted and Licensed Materials***

You may not copy or use any copyrighted, trademarked, or licensed documents or computer programs without written permission. You shall not use or copy any customer, supplier or employee contract, document, computer system, software, publication, information, or product when to do so violates a third party's property right.

### ***Gifts and Gratuities***

It is HCCH's desire to always preserve and protect its reputation and to avoid the appearance of impropriety. Consequently,

- **Gifts from Patients or Family Members**—You are prohibited from asking for tips or gifts from patients. You may accept non-monetary gifts of a nominal value from patients. If a patient or other individual wishes to present a monetary gift, he/she should be referred to the Harrison County Community Hospital Foundation.
- **Gifts Influencing Decision-making**—You may not accept gifts, favors, services, entertainment, or other things of value if doing so might influence decision-making or actions affecting HCCH. Similarly, do not offer or give money, services, or other things of value with the hope or expectation of influencing a decision by any purchaser, supplier, customer, government official or other person in your favor or to favor HCCH.
- **Gifts from Existing Vendors and Vendor-Sponsored Entertainment**—You are permitted to accept gifts and/or entertainment from vendors only when there is no expectation of an action in return (no strings attached) and the gifts and entertainment have only nominal value. Remember that any gift or benefit (large or very small) is illegal if even just one purpose for the gift is obtaining business that is reimbursable by Medicare, Medicaid, or other government programs. If you have a concern whether a gift should be accepted, discuss it with your supervisor. To the extent possible, these gifts should be shared with the employees' co-workers.

### ***Workshops, Seminars and Training Sessions***

Your attendance at local, vendor sponsored workshops, seminars and training sessions is permitted with the approval of your supervisor.

### ③ Maintain Confidentiality

---

HCCH employees who are in possession of and have access to confidential, sensitive, and proprietary information, have an obligation to actively protect and safeguard confidential, sensitive, and proprietary information in a manner designed to prevent the unauthorized disclosure of information. Any unauthorized use or disclosure of such information may result in disciplinary action up to and including termination.

- **Patient Information**—Patients we care for expect us to maintain confidentiality and security of the information we collect about them to provide them with quality care and perform other health care related job duties. We comply with the Health Insurance Portability and Accountability Act (HIPAA) the Health Information Technology for Economic and Clinical Health (HITECH) Act requirements and state confidentiality laws. We do not use, disclose, or access patient information except as needed to provide care, as required, or allowed by law, or with written authorization of the patient or legal representative.
- **Proprietary Information**—Information, ideas, and intellectual property assets of HCCH are important to organizational success. Information pertaining to HCCH's competitive position or business strategies, payment and reimbursement information, and information relating to negotiations with employees, or third parties should be protected and shared only with employees having a need to know such information to perform their job responsibilities. You are responsible for protecting intellectual property rights, including patents, trademarks, copyrights, and software is carefully maintained and managed to preserve and protect its value.
- **Personnel Records and Medical Staff Actions and/or Decisions**
- Medical staff and personnel files, salary, benefit, and other personal information relating to medical staff and employees must be kept confidential. You are expected to exercise due care to prevent the release or sharing of personnel and medical staff information beyond those people who need this information to fulfill their job functions.

### ④ Avoid Conflicts of Interest

---

A conflict of interest occurs when an employee's personal interests influence or appear to influence his or her ability to make objective decisions to act in the best interest of HCCH and/or HCCH's patients. A conflict of interest may also exist if the demands of any outside activities hinder the performance of your job or cause you to use HCCH resources for other than HCCH purposes. You are obligated to keep yourself continually free from conflicts of interest in the performance of your responsibility at HCCH. (Please refer to the HCCH Conflict of Interest Policy for further guidance.)

Some examples of activities that may be considered a conflict of interest for employees or their spouses and other immediate family members (parents, grandparents, children, grandchildren, siblings, in-laws, adopted, half, and step members of the family) are described below.



Outside financial interest if you have ownership in or employment by any outside entity that does business with HCCH—This does not apply to stock or other investments held in a publicly held corporation, provided the value of the stock or other investments does not exceed 5 percent of the corporation's stock. HCCH may, following a review of the relevant facts, permit ownership interests which exceed these amounts if management concludes such ownership interests will not adversely impact HCCH's business interest or the judgment of the person.

- Relationships with suppliers, purchasers, or competitors—Avoid personal ties to or bias toward vendors.
- Representation of HCCH by an employee in any transaction with a business in which he or she or a family member has personal interest.
- Disclosure or use of confidential, special or inside information of or about HCCH, particularly for your or a household member's personal profit or advantage.
- Personal use of HCCH property and/or HCCH information.
- Competition with HCCH by a covered person, directly or indirectly, in the purchase, sale or ownership of property or property rights or interests or business investment opportunities.
- Participation on Boards of Directors/Trustees—You are encouraged to be active in the community, including serving on civic or charitable organization boards. When considering serving on a board keep the following in mind.
  - ◊ Do not vote on matters that could affect any HCCH entity.
  - ◊ When serving on a board be sure to do so only in your individual capacity. Do not speak as a representative of HCCH unless written authorization from the CEO is obtained.
  - ◊ You must obtain approval from the CEO prior to serving as a member of the Board of Directors of any organization whose interests may conflict with those of HCCH.
  - ◊ HCCH retains the right to prohibit membership on any outside board of directors where membership conflicts with the best interests of HCCH.
- Honoraria—You are encouraged, with the permission of your supervisor, to participate as faculty and speakers at educational programs and functions, and to write research papers and articles. However, any honorarium more than incurred expenses shall be turned over to HCCH unless you used paid time off (PTO) or personal time to attend the program or that portion of the program for which the honoraria is paid, or in the case of authorships, used PTO or personal time to perform the research and writing.
- Conflict of Interest Policy—Directors, officers and employees must disclose all outside Board of Directors/Trustees activities in the annual Conflict of Interest disclosure statement.

## ⑤ Be a Good Steward of HCCH Assets

---

HCCH's assets (including financial resources, human talents, supplies, equipment, and reputation) must be used only to further HCCH's mission. As responsible stewards of HCCH resources, you are expected to

- keep accurate and complete financial records.
- only use HCCH assets to further HCCH health care mission—not for personal business or benefit.
- not use HCCH equipment, supplies, materials, or services for unauthorized purposes.
- use HCCH assets prudently for business travel.

## ⑥ Professional Conduct

---

As an HCCH employee, you are responsible for promoting a positive and professional environment and are accountable for your personal, professional, and ethical behavior.

- Exercise good judgement and professionalism in all social media interactions. Clearly distinguish between personal and professional social media accounts and ensure that personal opinions do not conflict with the values and principles of HCCH.
- Objectively evaluate your appearance and actions for their impact on the professional reputation of HCCH.

## How do I ask a question or report a concern?

As an HCCH employee, you have the most direct link to our patients and our operations and are in the best position to identify areas for improvement. HCCH relies on you to provide feedback and report potential problems so that corrections and improvements can be made as needed to support continuous improvement in the quality of our services.

You are encouraged and expected to use any or all of the following options, as needed, to get information or report a concern so you can **Do the Right Thing** and also support your fellow physicians and co-workers in doing the same.

Speak with a supervisor.

Contact your Compliance or Privacy Officer.

Call the Compliance Hotline at **(660) 425-0399**.

Email **[compliance@hcchospital.org](mailto:compliance@hcchospital.org)**.

Leave written explanation in Compliance Officer's mailbox.

## **What are the consequences of failure to comply with the HCCH Code of Conduct?**

There are a variety of potentially serious consequences if we fail to comply with laws, regulations and HCCH policies and procedures. The consequences to HCCH include risks to patient safety, refund of payments received from governmental programs, civil or criminal liability, exclusion from federal payment programs and loss of tax-exempt status. In addition, employees may be subject to disciplinary action, including suspension, termination of employment or termination of contractual relationship. Individuals may also be prosecuted and subject to substantial fines. Any questions about the application of these policies should be directed to an employee's supervisor, the hospital CEO, or the Compliance Officer.

### **Compliance Hotline (660) 425-0399**

**To report a concern anonymously, call the Compliance Hotline.**

The Compliance Hot Line is available 24 hours a day, 7 days a week. You may remain anonymous if you wish. If you choose to identify yourself, there is no guarantee that your identity will remain confidential. However, when you identify yourself, it is easier for the Compliance Officer to provide you with a direct response or ask clarifying questions.

Updated 12/11/23.