

LEE MEMORIAL HEALTH SYSTEM BOARD OF DIRECTORS

POLICY MANUAL

no. 10.35B

category: General Operations

title: Organizational Code of Ethics

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PURPOSE:

To set forth the responsibility of the Lee Memorial Health System to the patients and community it serves to conduct its business and operations in a consistent ethical manner as expressed by its mission, vision/values, and strategic plan and related policies.

POLICY:

As a community health care organization, the Lee Memorial Health System has a responsibility both to the patients and to the wider community it serves to conduct its operations within a consistent ethical framework as defined by its mission statement and related policies, including the following statement. It is our responsibility as part of the caregiving community, which includes directors, administrators, employees, physicians and auxiliaries, to act in a manner that is consistent with the following general principles:

Respect for the Patient:

We will treat all patients with dignity, respect and courtesy. Our patients, their families or their surrogate decision-makers will be involved in decisions regarding the care that we deliver to the extent that it is practical. We will also seek to inform all patients about the therapeutic alternatives and the risks associated with the care they will receive. We will constantly strive to understand and respect their objectives for care. In all circumstances, we will strive to treat patients in a manner that gives reasonable thought to their diverse cultures and spiritual beliefs.

Resolution of Conflicts:

We recognize that from time to time conflicts may arise among those who participate in patient care decisions. Whether this conflict is between administrators, employees, or physicians; or between caregivers and the patient, we will seek to resolve all conflicts

fairly, objectively, and in a timely manner. In cases where mutual satisfaction cannot be achieved, we will attempt to resolve the conflict to the optimum benefit of all concerned.

Recognition of Potential Conflicts of Interest:

We recognize that the potential for conflict of interest exists for decision makers at all levels. This includes directors, administrators, employees, physicians and auxiliaries. It is our policy to request the disclosure of potential conflicts of interest so that important decisions are not inappropriately influenced by such conflict. In the event a potential conflict of interest has a direct implication for patient care, the System Ethics Committee may assist in seeking resolution of the issue.

Ethical and Fair Billing Practices:

The Lee Memorial Health System and the members of its medical staffs will invoice patients or third party payors for care only for services actually provided to patients and will provide assistance to patients seeking to understand the cost and charges relative to their care. We will attempt to resolve questions and objections relative to the bills for services of the Lee Memorial Health System to the satisfaction of the patient in light of the responsibility which our Board bears to the community, the institution and the other patients whom we serve.

Confidentiality:

The Lee Memorial Health System expects directors, administrators, employees, physicians and auxiliaries to keep information of a sensitive or personal nature confidential. Information concerning patients, including their condition and treatment, as well as information regarding personnel and management matters, should be discussed and disclosed within the System and only as necessary and that no disclosure of such information should occur outside the organization unless required or authorized by law.

GUIDING DOCUMENTS AND PRINCIPLES

Board Policies and Procedures:

Ethical behavior is guided by the following organizational documents developed with System-wide input and adopted by the Board of Directors:

- Mission Statement and Strategic Objectives
- Lee Memorial Health System Values
- Lee Memorial Health System Vision Statement
- Lee Memorial Health System Code of Excellence
- Lee Memorial Health System Performance Improvement Plan
- Lee Memorial Health System Strategic Plans

Services and Technology:

New services and technology shall be consistent with the mission of Lee Memorial Health System. Acquisition of such new services and technology is based on safety, efficacy, efficiency, costs, experience, availability from other sources, number of persons in the community who may benefit and the System's ability to provide other needed services as well as the availability of personnel qualified to utilize and provide such new services and technology.

Patient Rights:

Ethical relationships with patients and their families close friends and representatives are described in Administrative Policy and Procedure 8.18.

The Patient Rights Policy is implemented through:

- Employee Orientation
- Ongoing inservice education
- System newsletter articles
- Publication in the Patient Handbook
- Posting of appropriate notices in common areas
- Visits by patient representatives
- Community education efforts
- The System Ethics Committee

Additional Administrative Policies and Procedures related to Patient Rights cover the following subjects:

- Advance Directives
- Withholding of Resuscitative Services
- Confidentiality
- Informed Consent
- Patient Restraint and Seclusion
- Anatomical Gifts
- Communication Assistance

Billing Practices Policies:

Patients are billed only for services and care provided to them, and:

- All final patient bills are capable of being itemized, and specify date of service
- Questions regarding bills are handled in a courteous and timely fashion
- Collection procedures are consistent with the Florida and Federal Fair Debt Collection Act

Additional Administrative and Departmental Policies and Procedures related to billing practices cover the following subjects:

- Credit and Collection Policy
- Time Pay Accounts
- Write-offs to Bad Debt and Charity
- Self-pay Collection
- Billing Third-Party Payers
- Medicare as Secondary Payer

Marketing and Public Relations:

Marketing of its services and facilities is conducted by the Lee Memorial Health System with truth, accuracy, fairness and responsibility towards patients, the community and the public. It holds to the principles of the dignity of the individual and freedom of speech, assembly, religion and the press. Lee Memorial Health System adheres to the Code of Professional Standards of the Public Relations Society of America.

Marketing materials reflect the type, scope and location of available services; the level of licensure and accreditation enjoyed by the various System facilities, personnel and services; and comply with applicable laws and regulations governing truth in advertising and non-discrimination.

Admission, Transfer and Discharge of Patients:

Admission, transfer and discharge of patients in non-elective care situations is without regard to the patient's ability to pay. All decisions regarding admission, transfer and discharge are made based on bona fide medical judgment, and not fiscal considerations.

Additional Administrative and Department Policies and Procedures related to admission, transfer, and discharge cover the following subjects:

- Discharge Planning Program
- Transferring Patients
- Patient Admissions
- ICU Admission and Discharge Criteria

Conflicts of Interest in Contractual Relationships:

Potential conflicts of interest in contractual relationships arise in the conduct of business. The Board of Directors and Administration will review all transactions and the persons involved regarding possible violations of the Florida Code of Ethics for Public Officers and Employees. Potential harm to the System and to its standing in the community, as well as the impact on patients and other members of the community is always a consideration. The following Board and Administration Policies and Procedures deal with these issues:

- Board Policy 20.02 – Conflict of Interest
- Board Policy 20.06 – Contracts
- Board Bylaws, Article I, Sections 4 and 5
- Administrative Policy and Procedure:
 - a) Conflicts of Interest and Code of Ethics
 - b) Purchasing
 - c) Gratuities