

**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 affiliated 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.

**IV. PROCEDURE**

1. All employees shall be provided with education and instruction regarding the WVUPC Code of Conduct within 30 days of hire, an annually thereafter. Code of Conduct education will also be provided to CAMC residents at the time of their initial orientation, and annually thereafter.
2. Each person who is required to receive the Code of Conduct 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.

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 employees and associates 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 employees and associates 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 for both WVUPC employees and other relevant associates 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 posted on the WVUPC website and/or distributed to employees and affiliated associates 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**

- Section II of the WVUPC Compliance Plan (Code of Conduct)