

Mountain Land Rehabilitation

Corporate Compliance & Continuous Quality Improvement Programs

- 1. MLR Code of Ethical Behavior**
- 2. Ethical Standards/Ethics Committee**
- 3. Code of Conduct**
- 4. MLR Corporate Compliance Required Competency**
- 5. MLR Continuous Quality Improvement (CQI) Programs**

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ORGANIZATIONAL CODE OF ETHICAL BEHAVIOR

POLICY:

- A. Mountain Land Rehabilitation, its Board of Directors, and employees conduct patient care and all other business operations in an ethical manner consistent with the mission, vision, values, strategic plans, and policies referred to in the following sections.
- B. Ethical practices include, but are not limited to, patient rights, admissions, transfer and discharge policies, billing practices, business practices, marketing practices, personnel behavior, and professional ethics.

PURPOSE: To support the mission of Mountain Land Rehabilitation to conduct business in a professional and ethical manner.

PROCEDURES:

A. Code of Ethics

The Board of Directors of Mountain Land Rehabilitation establishes this Code of Ethics for their health care system. This Code of Ethics is to guide the quality and integrity of our many relationships and the provision of our varied services. Members of the Board of Directors, employees, and those who provide contractual services to Mountain Land Rehabilitation will conform to the ethical intent of this statement and the policies that support it thereby providing the highest levels of care and services possible.

B. Statement of Purpose

Mountain Land Rehabilitation extends quality health care services to all individuals without discrimination toward any.

C. Statement of Ethical Values

Mountain Land Rehabilitation's values are derived from the organization's Missions, Vision, and Values. These values include Enhancing Potential, Customer Satisfaction, Dedication to the Community, Mutual Respect, Integrity, and Creativity. As employees serving customers and one another, we seek the well-being of all persons without discrimination.

The operation of Mountain Land Rehabilitation will be accomplished in accordance with ethical values and a deep commitment to the community.

D. Statement of Ethical Commitments

Mountain Land Rehabilitation is committed to acting in accordance with the following beliefs and commitments:

1. Commitment to Our Patients
 - a. We believe that our patients' needs, expectations, and rights, which are clearly stated in the Patients' Rights document, are our highest priorities.
 - b. We believe in recognizing and respecting the unique familial, social, ethnic, cultural, emotional, and spiritual needs and values of our patients and their families.
 - c. We believe and support the rights of individuals and families to make informed decisions in the ethical provision of health care.
 - d. We believe in the individuals' right to dignity, respect, and self-determination, which includes the right to perform or refuse to perform tasks in or for Mountain Land Rehabilitation.
 - e. We believe those who receive our care should also receive confidential treatment of information pertaining to their care.
 - f. We believe in the right of the individual, families and care-givers to assist in resolving ethical issues and conflicts arising in the provision of care, and to this end provide structures and processes for such discussions.
 - g. We believe in fair and understandable billing while seeking payment only for services actually rendered, assessing charges at reasonable rates, having auditing procedures to ensure accurate billing, and responding to billing questions courteously, quickly, helpfully, and justly.
 - h. We believe that conflicts of interest can adversely affect the delivery of health care to our customers and therefore will make every effort to discover and ethically deal with these conflicts.
2. Commitment to Our Community
 - a. We believe it is our responsibility to provide accessible health care.
 - b. We believe it is our duty to be financially responsible in the structure and delivery of health care service.
 - c. We believe it is our responsibility to contribute to the improvement of the general health and wellness of our community through a continuum of care, effective community education, and continuous improvement of our services.
 - d. We believe that we should advertise only those services which we can actually provide in a quality manner, and this should be done in a non-deceptive, truthful way.
 - e. We believe that it is our responsibility to provide care to those who are in need within the reasonable bounds of fiscal responsibility.
 - f. We believe that it is our responsibility to be a good corporate citizen by conducting business in a manner that is in the mutual best interest of Mountain Land Rehabilitation and the community we serve.
3. Commitment to Our Employees
 - a. We believe employees deserve a safe work environment that fosters interdependence, teamwork, innovation, initiative, and opportunities for growth through personal and professional support, training, and development.
 - b. We believe in a climate of mutual trust and respect promoted through processes of fair evaluation, equitable compensation, ongoing support and consistent recognition of behavior which enhances our core values.
 - c. We respect the diversity of employees' gifts and talents, and we believe in each employee's unique ability to contribute toward quality patient care.

- d. We believe in fostering an environment that allows employees to serve patients with a compassionate attitude and caring spirit.
 - e. We believe employees are entitled to a clear understanding of their roles and the information necessary for informed decision-making and planning.
 - f. We believe that employees are to be treated with respect and that there is a just process for prompt and impartial consideration of differences.
4. Commitment to Our Values
- a. We believe that the essence of Enhancing Potential is accomplished through prudent decisions and actions which result in a system that is stronger and better positioned for future generations.
 - b. We believe it is our responsibility to manage our resources efficiently.
 - c. We care deeply about this health care system known as Mountain Land Rehabilitation which is an integral part of the community and are committed to its long-term viability.
 - d. We believe in creating our future through openness to self- evaluation and evaluation of new concepts and ideas that can enhance our potential as the community's rehabilitation system of choice.
- D. Patient Rights Policies
- 1. Patient Rights policies shall be implemented through:
 - a. Staff education in orientation.
 - b. Formal and informal educational offerings.
 - c. Provision of pamphlets and posters in common areas.
 - d. Visits by patient representatives.
 - e. Staff and Community Education about Advanced Directives.
 - f. Mountain Land Rehabilitation's Ethics Committee.
- E. Billing Practices
- 1. General billing complaints are handled promptly by the Business Office. Billing complaints related to patient care are referred to Director of Corporate Compliance for investigation and resolution.
 - 2. Relevant practices include, but are not limited to:
 - a. Billing
 - All patients receive a fair and understandable bill, seeking payment only for services actually rendered, assessing charges at reasonable rates, having auditing procedures to ensure accurate billing, and responding to billing questions courteously, quickly, helpfully, and justly.
 - b. Financial assistance - determinations, policies and procedures.
 - c. Collections - Patients accounts and collections policies.
 - d. Patient & Family Complaints/Commendations - process and policies.
- G. Marketing and Public Relations Practices
- 1. Marketing practices are conducted with truth, fairness, and responsibility to patients, the community, and the public at large.
 - 2. Marketing materials reflect services available, and comply with applicable laws and regulations of truth in advertising and nondiscrimination.
 - 3. Marketing and Community Relations material are extensively reviewed for accuracy by departmental and executive management prior to publication.
 - 4. Community Relations follow the General Guide for the Release of Patient Information as published by The American Society for Health Care Marketing and Public Relations of the American Hospital Association.
 - 5. Community Relations follow ethical standards of the Public Relations profession, as expressed in the Codes of Ethics of the Public Relations Society of America (PRSA) and other professional associations.
- H. Conflicts of Interest in Contractual Relationships
- 1. Personnel authorized to enter into contracts or approve other contractual

relationships agree to disclose any actual or potential conflict of interest and/or refrain from voting on a approval. Mountain Land Rehabilitation does not contract for services with employees or their family members due to the risk of conflict of interest.

2. To avoid unfair favoritism, employees are not permitted to accept gratuities from vendors or potential vendors. Vendors and employees are informed of this policy.
3. Necessary policies related to Conflicts of Interest shall include, but are not limited to:
 - a. Conflict of Interest and Disclosure of Interest
 - b. Harassment
 - c. Ethical Conduct for Vendors and Employees
 - d. Gratuities
 - e. Disposal of Assets

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ETHICAL STANDARDS OF PATIENT CARE

POLICY:

1. Standards of care and practice determine expectations, identify measurable outcomes, and provide a basis for evaluation of care. Standards are adapted throughout all departments and form a basis for the delivery of care as well as the development of policies, procedures, annual goals, and quality improvement activities.
2. The delivery of care is based on the following universal moral principles:
 1. Is it fair to all concerned?
 2. Is it truthful?
 3. Is it in the best interest of our patients?

PURPOSE: PT/OT/ST standards of care address the goals and values of the therapy staff. They express the moral commitment to uphold the values and special ethical obligations of all therapists in the protection, promotion, and functional restoration of health.

PROCEDURES:

- I. The therapists provide services with respect for human dignity and the uniqueness of the client, unrestricted by considerations of social or economic status, personal attributes, or the nature of health problems.
 - A. **Respect for Human Dignity.**

The fundamental principle of therapy practice is respect for the inherent dignity and worth of every client. Therapists are morally obligated to respect human existence and the individuality of all persons who are the recipients of therapy actions. Therapists therefore must take all reasonable means to protect and preserve human life and functional abilities when there is hope of recovery or reasonable hope of benefit from treatment.

Truth telling and the process of reaching informed choice underlie the exercise of self-determination, which is basic to respect for persons. Clients should be as fully involved as possible in the planning and implementation of their own goal setting. Clients have the moral right to determine what will be done with their own person; to be given accurate information necessary for making informed judgments; to be assisted with weighing the benefits and burdens of options in their treatment; to accept, refuse, or terminate treatment without coercion; and to be given necessary emotional support. Each therapist has an obligation to be knowledgeable about the moral and legal rights of all clients and to protect and support those rights. In situations in which the client lacks the capacity to make a decision, the therapist should work with the Mountain Land Rehabilitation and/or facility team and client's family and care giver to identify one decision-maker.

B. Status and Attributes of Client.
The need for health care is universal, transcending all national, ethnic, racial, religious, cultural, political, educational, economic, developmental, personality, role, and sexual differences. Therapeutic care is delivered without prejudicial behavior. Individual value systems and lifestyles should be considered in the planning of health care with and for each client. Attributes of clients influence therapy practice to the extent that they represent factors a therapist must understand, consider, and respect in tailoring care to personal needs and in maintaining the individual's self-respect and dignity.

C. The Nature of Health Problems.
The therapist's respect for the worth and dignity of the individual human being applies, irrespective of the nature of the health problem. It is reflected in care given the person who is disabled as well as one without disability, the person with long-term illness as well as one with acute illness, the recovering patient as well as one in the last phase of life. This respect extends to all who require the services of the therapist for the promotion of health, the prevention of illness, the restoration of function and the alleviation of suffering.

The therapist's concern for human dignity and for the provision of high quality care is not limited by personal attitudes or beliefs. If ethically opposed to interventions in a particular case or because of the procedures to be used, the therapist should make his/her concerns known in advance and in time for other appropriate arrangements to be made for the client's care.

D. The Setting for Health Care.
The therapist adheres to the principle of nondiscriminatory, non-prejudicial care in every situation and endeavors to promote its acceptance by others. The setting shall not determine the therapist's readiness to respect clients or to render or obtain needed services.

II. The therapist safeguards the client's right to privacy by judiciously protecting information of a confidential nature.

A. The Client's Right to Privacy.
The right to privacy is a basic human right. The client trusts the therapist to hold all information in confidence. This trust could be destroyed and the client's welfare jeopardized by injudicious disclosure of information provided in confidence. The duty of confidentiality, however, is not absolute when innocent parties are in direct jeopardy.

B. Protection of Information.
The rights, well-being, and safety of the individual client should be the determining factors in arriving at any professional judgment concerning the disposition of confidential information received from the client relevant to his or her treatment. The standards of therapy practice and the therapist's responsibility to provide high quality health services require that relevant data be shared with members of the health team. Only information pertinent to a client's treatment and welfare is disclosed, and it is disclosed only to those directly concerned with the client's care.

Information documenting the appropriateness, necessity, and quality improvement mechanisms may be disclosed only under defined policies, mandates, or protocols. These written guidelines must assure that the rights, well-being, and safety of the client are maintained.

C. Access to Records.
If in the course of providing care there is a need for the therapist to have access to the records of persons not under the therapist's care, the persons

affected should be notified and, whenever possible, permission should be obtained first. Although records belong to the agency where the data are collected, the individual maintains the right of control over the information in the record. Similarly, professionals may exercise the right of control over information they have generated in the course of health care.

If the therapist wishes to use a client's treatment record for research or non-clinical purposes in which anonymity cannot be guaranteed, the client's consent must be obtained first. Ethically, this ensures the client's right to privacy; legally, it protects the client against unlawful invasion of privacy.

III. The therapist acts to safeguard the client and the public when health care and safety are affected by the incompetent, unethical, or illegal practice by any person.

A. Safeguarding the Health and Safety of the Client.

The therapist's primary commitment is to the health, welfare, and safety of the client. As an advocate for the client, the therapist must be alert to and take appropriate action regarding any instance of incompetent, unethical, or illegal practice by any member of the health care team or the health care system, or any action on the part of others that places the right or best interests of the client in jeopardy. To function effectively in this role, therapists must be aware of Mountain Land Rehabilitation policies and procedures, standards of practice, and laws governing therapy and health care practice with regard to incompetent, unethical, or illegal practice.

B. Acting on Questionable Practice.

When the therapist is aware of inappropriate or questionable practice in the provision of health care, concern should be expressed to the person carrying out the questionable practice and attention called to the possible detrimental effect upon the client's welfare. When factors in the health care delivery system threaten the welfare of the client, similar action should be directed to their Director/Manager or up the chain of command. The Director of Corporate Compliance should also be contacted so that such reporting can go through official channels without causing fear of reprisal. The therapist should be knowledgeable about the process and be prepared to use it if necessary. Some situations may warrant the concern and involvement of the State Practice Board and the therapist may be asked to participate in the investigation. Accurate reporting and documentation underscore all actions.

C. Review Mechanisms.

The therapist should have available to them peer review committees (Human Resources, CQI) and ethics committees. Such ongoing review mechanisms are based on established criteria, have stated purposes, include a process for making recommendations, and facilitate improved delivery of therapy and other health care services to clients wherever therapy services are provided.

IV. The therapist assumes responsibility and accountability for individual therapy judgements and actions.

A. Acceptance of Responsibility and Accountability.

The recipients of professional therapy services are entitled to high quality rehabilitation care. Individual professional licensure is the protective mechanism legislated by the public to ensure the basic and minimum competencies of the professional therapist. Beyond that, society has accorded to the therapy professions the right to regulate their own practices. The regulation and control of therapy practice by therapists demand that individual practitioners of professional therapy must bear primary responsibility for the therapy care clients receive and must be individually accountable for their own practice.

B. Responsibility for Therapy Judgement and Action.

Responsibility refers to the carrying out of duties associated with a particular role assumed by the therapist. In recognizing the rights of clients, a collaborative relationship is facilitated between the therapist and the client through use of the therapeutic process. Therapy responsibilities include data collection and assessment of the status of the client; formation of therapy diagnoses derived from client assessment; development of a care plan that is directed toward designated goals, assists the client in maximizing his or her capabilities, and provides for the client's participation in promoting, maintaining, and restoring his or her health; evaluation of the effectiveness of care in achieving goals as determined by the client and the therapist; and subsequent reassessment and revision of the care plan as warranted. In the process of assuming these responsibilities, the therapist is held accountable for them.

- C. **Accountability for Therapy Judgment and Action.**
Accountability refers to being answerable and responsible to someone for something one has done. It means providing an explanation or rationale to oneself, to clients, to peers, to the profession, and to society. In order to be accountable, therapists act under a code of ethical conduct that is grounded in the moral principles of fidelity and respect for the dignity, worth, and self-determination of clients.

Therapists are accountable for judgements made and actions taken in the course of practice. Neither physicians' orders nor Mountain Land Rehabilitation's policies relieve the therapists of accountability for actions taken and judgements made.

- V. **The therapist maintains competence in specific discipline.**

- A. **Personal Responsibility for Competence.**
A professional is obligated to provide adequate and competent care. Therefore, it is the personal responsibility of each therapist to maintain competency in practice. For the client's optimum well-being and for the therapists own professional development, the care of the client reflects and incorporates new techniques and knowledge in rehabilitation as these develop, especially as they relate to the therapist's particular field of practice. The therapist must be aware of the need for continued professional learning and must assume personal responsibility for currency of knowledge and skills.

- B. **Measurement of Competence in Practice.**
Evaluation of one's performance by peers is a hallmark of professionalism and a method by which the profession is held accountable to society. Therapists must be willing to have their practice reviewed and evaluated by their peers. Each therapist is responsible for participating in the development of objective criteria for evaluation. In addition, the therapist engages in ongoing self-evaluation of clinical competency, decision-making abilities, and professional judgments.

- C. **Intraprofessional Responsibility for Competence.**
Therapists share responsibility for high quality care. They are required to have knowledge relevant to the current scope of practice, changing issues and concerns, and ethical concepts and principles. Since individual competencies vary, therapists refer clients to and consult with therapists with expertise and recognized competencies in various fields of practice.

- VI. **The therapist exercises informed judgment and uses individual competency and qualifications as criteria in seeking consultation, accepting responsibilities, and delegating activities.**

- A. **Changing Functions.**

Therapists' are faced with decisions in the context of the increased complexity of health care, changing patterns in the delivery of health care services, and the development of evolving practice in response to the health needs of clients. As the scope of practice changes, the therapist must exercise judgement in accepting responsibilities, seeking consultation, and assigning responsibilities to others.

- B. **Accepting Responsibilities.**
The therapist must not engage in practices prohibited by law or delegate to others activities prohibited by practice acts of other health care personnel or by other laws. Therapists determine the scope of their practice in light of their education, knowledge, competency, and extent of experience. If the therapist concludes that he or she lacks competence or is inadequately prepared to carry out a specific function, they have the responsibility to seek alternative sources of care based on concern for the client's welfare. In that process, both the client and the therapist are protected.
 - C. **Consultation and Collaboration.**
The provision of health and rehabilitation care to clients is a complex process that requires a wide range of knowledge, skills, and collaborative efforts. Therapists must be aware of their own individual competencies. When the needs of the client are beyond the qualification and competencies of the therapist, consultation and collaboration must be sought from qualified therapists, other health professionals, or other appropriate sources. Participation in the intradisciplinary or interdisciplinary teams is an effective approach to the provision of high quality total health services.
 - D. **Delegation of Activities.**
Inasmuch as the therapist is accountable for the quality of therapy care rendered to clients, therapists are accountable for the delegation of therapy care activities to other health workers. Therefore, the therapist must assess individual competency in assigning selected components of care to other health care personnel. The therapist should not delegate to any member of the team a function for which that person is not prepared or qualified. Mountain Land Rehabilitation policies or directives do not relieve the therapist of accountability for making judgement about the delegation of such activities.
- VII. The therapist participates in activities that contribute to the ongoing development of the profession's body of knowledge.
- A. **The Therapist and Development of Knowledge.**
Every profession must engage in scholarly inquiry to identify, verify, and continually enlarge the body of knowledge that forms the foundation for its practice. A unique body of verified knowledge provides both framework and direction for the profession in all of its activities and for the practitioner in the provision of care. The accrual of scientific and humanistic knowledge promotes the advancement of practice and the well-being of the profession's clients, ongoing scholarly activity such as research and the profession's obligations to society. Each therapist has a role in these areas of professional activity, whether as an investigator in furthering knowledge, as a participant in research, or as a user to theoretical and imperial knowledge.
 - B. **Protection of Rights of Human Participants in Research.**
Individual rights valued by society and by the therapy professions that have particular application in research include the right of adequately informed consent, the right of privacy and preservation of dignity. Inherent in these rights is respect for each individual's rights to exercise self-determination, to choose to participate or not, to have full information, and to terminate participation in research without penalty.

It is the duty of the therapist functioning in any research role to maintain vigilance in protecting the life, health, and privacy of human subjects from both anticipated and unanticipated risks and in assuring informed consent. Subjects' integrity, privacy, and rights must be especially safeguarded if the subjects are unable to protect themselves because of incapacity or because they are in a dependent relationship to the investigator.

- C. General Guidelines for Participating in Research.
Before participating in research conducted by others, the therapist has an obligation to (a) obtain information about the intent and the nature of the research and (b) ascertain that the study proposal is approved by any appropriate bodies.
- VIII. The therapist participates in the profession's efforts to implement and improve standards of care.
- A. Responsibility to the Public for Standards.
Therapists are responsible and accountable for admitting to the profession only those individuals who have demonstrated the knowledge, skills, and commitment considered essential to the profession.

Established standards and guidelines for practice provide guidance for the delivery of professional care and is a means for evaluating care received by the public. The therapist has a personal responsibility and commitment to clients for implementation and maintenance of optimal standards of practice.
 - B. Responsibility to the Profession for Standards.
Established standards reflect the practice of PT/OT/ST grounded in ethical commitments and a body of knowledge. Professional standards or guidelines exist in PT/OT/ST. The therapist has the responsibility to monitor these standards in daily practice and to participate actively in the profession's ongoing efforts to foster optimal standards of practice at the local, regional, state, and national levels of the health care system.
- IX. The therapist participates in the profession's efforts to establish and maintain conditions of employment conducive to high quality rehabilitation care.
- A. Responsibility for conditions of Employment.
The therapist must work with Mountain Land Rehabilitation Administration to ensure conditions exist that (a) enable the therapist to practice in accordance with the standards of practice and (b) provide a care environment that meets the standards of services. The provision of high quality care is the responsibility of both the individual therapy and management. Professional autonomy and self-regulation in the control of conditions of practice are promoted for implementing standards.
 - B. Maintaining Conditions for High Quality Rehabilitation Services.
Articulation and control of practice can be accomplished through individual agreement and collaboration. Collaboration should be consistent with the profession's standards of practice and the state law regulating practice.
- X. The therapist participates in the profession's effort to protect the public from misinformation and the misrepresentation and to maintain the integrity of rehabilitation.
- A. Protection From Misinformation and Misrepresentation.
Therapists are responsible for advising clients against the use of products that endanger the client's safety and welfare. The therapist shall not use any form of public or professional communication to make claims that are false, fraudulent, misleading, deceptive, or unfair.

The therapist does not give or imply endorsement to advertising, promotion,

or sale of commercial products or services in a manner that may be interpreted as reflecting the opinion or judgement of the profession as a whole. The therapist may use knowledge of specific services or products in advising an individual client, since this may contribute to the client's health and well-being. In the course of providing information or education to clients or other practitioners about commercial products or service, however, a variety of similar products or services should be offered or described so the client or practitioner can make an informed choice.

B. Maintaining the Integrity of Rehabilitation.

The use of the title *registered or licensed therapist* is granted by state governments for the protection of the public. Use of the title carries with it the responsibility to act in the public interest. The therapist may use the title PT, PTA, OTR, COTA and SLP-CCC and symbols of academic degrees or other earned or honorary professional symbols of recognition in all ways that are legal and appropriate. The title and other symbols of the profession should not be used, however, for benefits unrelated to therapy practice or the profession, or used by those who may seek to exploit them for other purposes.

Therapists should refrain from casting a vote in any deliberations involving health care services or facilities where the therapist has business or other interests that could be construed as a conflict of interest.

XI. The therapist collaborates with members of the health professions and other citizens in promoting community and national efforts to meet the health care needs of the public.

A. Collaboration with Others to Meet Health Care Needs.

The availability and accessibility of high quality health care services to all people require collaborative planning on the local, state, national, and international levels that respect the interdependence of health care professionals and clients in health care systems. Rehabilitation is an integral part of high quality health care, and therapists have an obligation to promote equitable access.

B. Responsibility to the Public.

The therapy profession is committed to promoting the welfare and safety of all people. The goals and values are essential to effective delivery of health care services. For the benefit of the individual client and the public at large, therapy's goals and commitments need adequate representation. Therapists should ensure this representation by active participation in decision making in institutional and political arenas to assure a just distribution of health care resources.

C. Relationships with Other Disciplines.

The complexity of the health care delivery system requires a multidisciplinary approach to the delivery of services that have the strong support and active participation of all the health care professions. Therapists should actively promote the collaborative planning required to ensure the availability and accessibility to high quality health care services to all persons whose health needs are unmet.

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ETHICS COMMITTEE

POLICY: The Ethics Committee of Mountain Land Rehabilitation exists to provide information, guidelines, and advice to Mountain Land Rehabilitation employees, and patients and/or their designated representatives to support the basis for informed decision-making on ethical issues and to ensure employees are aware of the ethical issues surrounding patient care.

PURPOSE: To identify the procedure by which the Ethics Committee may be solicited for advice or formal consultation.

PROCEDURES:

- A. The Ethics Committee, when consulted, shall use the following documents as resources in consideration of the ethical boundaries/guidelines of each affected constituency. The overarching principle is the patient’s right to participate and make decisions about plan of care with information provided by the health care team.
 - 1. American Medical Association’s Code of Ethics. The AMA’s Code of Ethics is comprised of the following:
 - a. The Principles of Medical Ethics (Rev. 1980)
 - b. Current opinions with Annotations of the Council on Ethical and Judicial Affairs
 - c. Fundamental Elements of the Patient - Physician Relationship
 - d. Reports of the Council on Ethical and Judicial Affairs
 - 2. Employees of Mountain Land Rehabilitation will comply with all Mountain Land Rehabilitation policies and procedures which are developed in accordance with the most current Code of Governmental Ethics.

- B. Composition of Committee Structure:
 - 1. Membership - The Ethics Committee of Mountain Land Rehabilitation shall be comprised of at least the following:
 - a. The chairman - Director of Corporate Compliance (appointed by the Chief Executive Officer).
 - b. A Mountain Land Rehabilitation attorney (on call).
 - c. Representative from the Board of Directors.
 - d. Facility representative (as necessary).
 - e. Representative from staff (as necessary).
 - f. Other Management staff (as necessary).
 - 2. Meetings - The Ethics Committee shall meet annually or more frequently as required.

- C. Role of Ethics Committee:
 - 1. It is the defined role of the Ethics Committee to provide individual consultation on cases or issues with ethical dilemmas and to ensure that appropriate Mountain Land Rehabilitation staff is educated on recognizing an ethical issue as they arise.
 - 2. Requests for ethical consultations are strictly voluntary and may come from

- the administrators, managers, facility staff, Mountain Land Rehabilitation employees, patients and/or their designated representatives.
3. Patients and/or their designated representatives will be notified of their right to consult the Ethics Committee by receipt of the Patient's Bill of Rights upon admission to treatment.
 4. Employees of Mountain Land Rehabilitation will be notified of their right to consult the Ethics Committee through orientation, new employee training, and annual inservices (see attached form).
 5. All ethical consultation discussions will remain strictly confidential.
 6. All ethical consultations to the Committee will be documented as to the facts, issues, and recommendations of the Committee; these reports will be confidential and only available to the requesting party and members of the Committee.
 7. The opinions and recommendations of the Ethics Committee are relative to the consultation and are strictly advisory and non-binding.
 8. The Ethics Committee consultation is held with available members only, i.e., a quorum of a set number of members present is not required based on the usual short notice given for a consultation.

D. Ethics Committee Consultation Procedure:

1. The individual/individuals contacts the Director of Corporate Compliance/Ethics Committee Chairman regarding request for Ethics Committee consultation on a particular case or issue. The request is referred to the Director of Corporate Compliance/Ethics Committee Chairman for evaluation/screening. The Director of Corporate Compliance/Ethics Committee Chairman initiates the form "Guidelines for Ethical Thinking and Reflection," Addendum A.
2. Director of Corporate Compliance/Ethics Committee Chairman determines the appropriateness of the case or issues for consultation by the Committee; as appropriate, the Director of CCP reviews requests with Mountain Land Rehabilitation CEO or other relevant parties in evaluating request. The Director of CCP informs the party requesting a consult of the decision.
3. When the request is accepted, the Director of Corporate Compliance/Ethics Committee Chairman calls a meeting of the entire Committee on a time frame appropriate to the urgency of the request. The party requesting the consult and other relevant parties are invited to attend.
4. Prior to the consultation, the Director of CCP may request a literature search and/or expert consultation as appropriate.
5. During the consultation meeting, the Director of CCP facilitates the following steps:
 - a. Introduction of all parties present.
 - b. Specification of the steps, purpose, and outcomes of the consult and all information and/or discussion is to remain confidential.
 - c. Presentation of the case or issues by the party requesting the consult through a process which covers the facts, issues, and specific questions to be answered by the Committee.
 - d. Contribution by other parties relevant to the discussion.
 - e. Opportunity for Committee members to ask questions of the party requesting the consult and other relevant persons.
 - f. Dismissal of party requesting the consult and other parties to allow discussion among Committee members.
 - g. Allow each Committee member present to formally state their assessment and recommendations on the case or issue.
 - h. Summation of the case, issues, questions, and Committee recommendations.
6. The Director of CCP contacts the party requesting the consult immediately following the consult to summarize the Committee's evaluation and recommendations and reminds the party requesting the consult that recommendations are non-binding and advisory only.
7. The Director of CCP documents the consultation; forwards copy to party requesting the consult and retains copy in the Committee consult file.

MOUNTAIN LAND REHABILITATION

**Guidelines for Determination of Ethical Behavior
Ethics Committee**

Date of Consultation _____ Time _____

Person initiating request _____

Patient situation _____ M / F Age _____

Relationship of next of kin _____

Religion of patient _____

Primary physician _____

Other requesting physicians _____

Reason for request _____

Consultant participants: Patient? Yes / No

Ethics Committee members:

Others:

Medical/treatment/care information:

Diagnosis/prognosis: _____

Course of present illness: _____

Activities of daily living: _____

Other _____

Who are the interested parties and what is their involvement in this case?

Are there any legal/administrative concerns?

What are the ethical issues/conflicts?

What ethical principles are involved?

___Autonomy ___ Beneficence/non-maleficence ___ Justice
___ Other _____

What is known about the patient's perspectives on the present situation?

Is there a living will or durable power of attorney? Yes / No

If so, what do they say?

Is there a surrogate/legal guardian? Yes / No

Who? _____

Points of discussion and other pertinent information:

Committee reflection:

Notification of reflection:

Given to:

By whom:

Date:

Is this case recommended as a topic for Board of Directors Meeting? Yes / No

Consultation form completed by _____ Date _____

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CODE OF CONDUCT

POLICY: All officers, managers, contractors, and agents are responsible to ensure that their behavior and activity are consistent with the Code of Conduct. The Code of Conduct contains *Principles* articulating the policy of the organization and *Standards* which are intended to provide additional guidance to persons functioning in managerial or administrative capacities. The Principles set forth in this Code of Conduct shall be distributed periodically to all employees. The Principles and Standards shall be distributed annually to officers, employees, volunteers, and all staff members having administrative or managerial responsibilities.

PURPOSE: This Code of Conduct has been adopted by Mountain Land Rehabilitation to provide standards by which all officers, managers, employees, contractors, and agents of Mountain Land Rehabilitation will conduct themselves in order to protect and promote organization-wide integrity and to enhance Mountain Land Rehabilitation’s ability to achieve the organization’s missions.

PROCEDURES:

As used in this Code of Conduct, the term Mountain Land Rehabilitation means Mountain Land Rehabilitation and each of its divisions, subsidiaries, and operating or business units. The terms “officer,” “employee,” and “volunteer” include any person who fills such a role or provides services on behalf of Mountain Land Rehabilitation or any of its divisions, subsidiaries, or operating or business units.

A. Principle 1 - Legal Compliance

Mountain Land Rehabilitation will strive to ensure all activity by or on behalf of the organization is in compliance with applicable laws.

The following Standards are intended to provide guidance to employees and management in administrative positions to assist them in their obligation to comply with applicable laws. These standards are neither exclusive nor complete. Employees are required to comply with all applicable laws, whether or not specifically addressed in these policies. If questions regarding the existence of, interpretation or application of, any law arises, they should be directed to the Director of Corporate Compliance.

1. Standard 1.1 - Antitrust

All employees must comply with applicable antitrust and similar laws which regulate competitions.

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, deceptions, intimidation, and similar unfair practices Employees are expected to contact the Director of Corporate Compliance when confronted with business decisions involving a risk of violation of the antitrust laws who will seek advice from Mountain Land Rehabilitation legal counsel as necessary.

2. Standard 1.2 - Fraud and Abuse

Mountain Land Rehabilitation expects its employees to refrain from conduct which may violate the fraud and abuse laws. These laws prohibit (1) direct, indirect or disguised payments in exchange of the referral of patients; (2) the submission of false, fraudulent or misleading claims to any government entity or third party payor, including claims for services not rendered, claims which characterize the service differently than the service actually rendered, or claims which do not otherwise comply with applicable programs or contractual requirements; (3) making false representations to any person or entity in order to gain or retain participation in a program or to obtain payment for any service; and (4) refrain from developing or continuing any pattern of errors which have been previously identified by any governing agency as incorrect. (For additional guidance, please contact the Manger of Corporate Compliance.)

3. Standard 1.3 - Lobbying/ Political Activity

Mountain Land Rehabilitation expects each of its employees to refrain from engaging in activity which may jeopardize the organization, including a variety of lobbying and political activities.

- A. No individual may make any agreement to contribute any money, property, or services of any officer or employee at Mountain Land Rehabilitation's expense to any political candidate, party, organization, committee or individual in violation of any applicable law. Officers and employees may personally participate in and contribute to political organizations or campaigns, but they must do so as individuals, not as representatives of Mountain Land Rehabilitation, and they must use their own funds.
- B. Where its experience may be helpful, Mountain Land Rehabilitation may publicly offer recommendations concerning legislation or regulations being considered. In addition, it may analyze and take public positions on issues that have a relationship to the operations of Mountain Land Rehabilitation when Mountain Land Rehabilitation's experience contributes to the understanding of such issues.
- C. Mountain Land Rehabilitation has many contacts and dealings with governmental bodies and officials. All such contacts and transactions shall be conducted in an honest and ethical manner. Any attempt to influence the decision-making process of governmental bodies or officials by an improper offer of any benefit is absolutely prohibited. Any requests or demands by any governmental representative for anything of economic value should be immediately reported to the Director of Corporate Compliance.

4. Standard 1.4 - Environmental

It is the policy of Mountain Land Rehabilitation to manage and operate its business in the manner which respects our environment and conserves natural resources. Mountain Land Rehabilitation's employees with strive to

utilize resources appropriately and efficiently, to recycle where possible and otherwise dispose of all waste in accordance with applicable laws and regulations, and to work cooperatively with the appropriate authorities to remedy any environmental contamination for which Mountain Land Rehabilitation may be responsible.

5. Standard 1.5 - Discrimination

Mountain Land Rehabilitation believes that the fair and equitable treatment of employees, patients and other persons is critical to fulfilling its visions and goals.

It is the policy of Mountain Land Rehabilitation to treat all patients without regard to the race, color, religion, sex, ethnic origin, age or disability of such person, or any other classification prohibited by law.

It is a policy of Mountain Land Rehabilitation to recruit, hire, train, promote, assign, transfer, layoff, recall, and terminate employees based on that employee's ability, achievement, experience, and conduct without regard to race, color, religion, sex, ethnic origin, age or disability, or any other classification prohibited by law.

No form of harassment or discrimination on the basis of sex, race, color, disability, age, religion or ethnic origin or disability or any other classification prohibited by law will be permitted. Each allegation of harassment or discrimination will be promptly investigated in accordance with applicable human resource policies.

B. Principle 2 - Business Ethics

In furtherance of Mountain Land Rehabilitation's commitment to the highest standards of business ethics and integrity, employees will accurately and honestly represent Mountain Land Rehabilitation and will not engage in any activity or scheme intended to defraud anyone of money, property, or honest services.

The Standards set forth below are designed to provide guidance to ensure that Mountain Land Rehabilitation's business activities reflect the highest standards of business ethics and integrity. Employee conduct not specifically addressed by these standards must be consistent with Principle 2.

1. Standard 2.1 - Honest Communication.

Mountain Land Rehabilitation requires candor and honesty from individuals in the performance of their responsibilities and in communication with our attorneys and auditors. No employee shall make false or misleading statements to any patient, person, or entity doing business with Mountain Land Rehabilitation about other patients, persons, or entities doing business or competing with Mountain Land Rehabilitation, or about the products or services of Mountain Land Rehabilitation or its competitors.

2. Standard 2.2 - Misappropriation of Proprietary Information.

Mountain Land Rehabilitation employees shall not misappropriate confidential or proprietary information belonging to another person or entity and will not utilize any publication, document, computer program, information or product in violation of a third party's interest in such products. All Mountain Land Rehabilitation employees are responsible to ensure they do not improperly copy for their own use documents or computer programs in violation of applicable copyright laws of licensing agreements. Employees shall not utilize confidential business information obtained from competitors, including customer lists, price lists, contracts or other information in violation of a covenant not to compete, prior employment agreements, or in any other manner likely to provide an unfair competitive advantage to Mountain Land Rehabilitation.

3. Standard 2.3 - Fraud and Abuse

Mountain Land Rehabilitation expects its employees to refrain from conduct which may violate the fraud and abuse laws. These laws prohibit (1) direct, indirect or disguised payments in exchange for the referral of patients; (2) the submission of false, fraudulent or misleading claims to any government entity of third party payor, including claims for services not rendered, claims which characterize the service differently than the service actually rendered, or claims which do not otherwise comply with applicable programs of contractual requirements; (3) making false representations to any person or entity in order to gain or retain participation in a program to obtain payment for any service; and

(4) refrain from developing or continuing any pattern of errors which have been previously identified by any governing agency as incorrect.

C. Principle 3 - Confidentiality

Mountain Land Rehabilitation employees shall strive to maintain the confidentiality of patient and other confidential information in accordance with applicable legal and ethical standards.

Mountain Land Rehabilitation and its employees are in possession of and have access to a broad variety of confidential, sensitive, and proprietary information, the inappropriate release of which could be injurious to individuals, Mountain Land Rehabilitation's business partners and Mountain Land Rehabilitation itself. Every Mountain Land Rehabilitation employee has an obligation to actively protect and safeguard confidential, sensitive and proprietary information in a manner designed to prevent the unauthorized disclosure of information.

1. Standard 3.1 - Patient Information

All Mountain Land Rehabilitation employees have an obligation to conduct themselves in accordance with the principle of maintaining the confidentiality of patient information in accordance with all applicable laws and regulations. Employees shall refrain from revealing any personal or confidential information concerning patients unless supported by legitimate business or patient care purposes. If questions arise regarding an obligation to maintain the confidentiality of information or the appropriateness of releasing information, employees should seek guidance from management or Mountain Land Rehabilitation's Director of Corporate Compliance.

2. Standard 3.2 - Proprietary Information

Information, ideas, and intellectual property assets of Mountain Land Rehabilitation are important to organizational success. Information pertaining to Mountain Land Rehabilitation'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 in order to perform their job responsibilities. Employees should exercise care to ensure that intellectual property rights, including patents, trademarks, copyrights, and software is carefully maintained and managed to preserve and protect its value.

3. Standard 3.3 - Personnel Actions/Decisions

Salary, benefits, and other personal information relating to employees shall be treated as confidential. Personnel files, payroll information, disciplinary matters, and similar information shall be maintained in a manner designed to ensure confidentiality in accordance with applicable laws. Employees will exercise due care to prevent the release or sharing of information beyond those persons who may need such information to fulfill their job function.

D. Principle 4 - Conflicts of Interest

Board Members, officers, committee members, and employees ("covered persons") owe a duty of undivided and unqualified loyalty to the organization. Persons holding such positions may not use their positions to profit personally or to assist others in profiting in any way at the expense of the organization. (Please refer to Mountain Land Rehabilitation Policy for further guidance.)

All covered persons are expected to regulate their activities so as to avoid actual impropriety and/or the appearance of impropriety which might arise from the

influence of those activities on business decisions of Mountain Land Rehabilitation, or from disclosure or private use of business affairs or plans of Mountain Land Rehabilitation.

1. Standard 4.1 - Outside Financial Interests

While not all inclusive, the following will serve as a guide to the types of activities by a covered person, or related individual of such person, which might cause conflicts of interest:

- a. Ownership in or employment by an outside concern which does business with Mountain Land Rehabilitation. This does not apply to stock or other investments held in a publicly held corporation, *provided* the value of the stock or other investments is not a material portion of the corporation's stock. Mountain Land Rehabilitation may permit ownership interests so long as such ownership interests will not adversely impact Mountain Land Rehabilitation's business interest or the judgement of the covered person.
- b. Conduct of any business not on behalf of Mountain Land Rehabilitation, with any medical/rehabilitation vendor, supplier, contractor, or agency, or any of their officers or employees.
- c. Representation of Mountain Land Rehabilitation by a covered person in any transaction in which he or she or a related individual has a substantial personal interest.
- d. Disclosure or use of confidential, special or inside information of or about Mountain Land Rehabilitation, particularly for personal profit or advantage of the covered person or a related individual.
- e. Competition with Mountain Land Rehabilitation by a covered person, directly or indirectly, in the purchase, sale or ownership of property or property rights or interest, or business investment opportunities.

2. Standard 4.2 - Services for Competitors/Vendors

No covered person shall perform work or render services for any competitor of Mountain Land Rehabilitation or for any organization with which Mountain Land Rehabilitation does business or which seeks to do business with Mountain Land Rehabilitation outside of the normal course of his/her employment with Mountain Land Rehabilitation without the approval of the Chief Executive Officer or Officers of Mountain Land Rehabilitation.

3. Standard 4.3 - Participation on Boards of Directors/Trustees

- a. A covered person must obtain approval from his/her supervisor prior to serving as a member of the Board of Directors/Trustees of any organization whose interests may conflict with those of Mountain Land Rehabilitation.
- b. A covered person who is asked, or seeks to serve on the Board of Directors/Trustees of any organization whose interest would not impact Mountain Land Rehabilitation (for example, civic [non-governmental], charitable, fraternal and so forth) will not be required to obtain such approval.
- c. All fees/compensation (other than reimbursement for expenses arising from Board participation) that are received for Board services provided during normal work time shall be paid directly to Mountain Land Rehabilitation unless approved by Officers for end to accept.
- d. A covered person must disclose all Board of Directors/Trustees activities in the Conflict of Interest disclosure statement.
- e. Mountain Land Rehabilitation retains the right to prohibit membership on any Board of Directors/Trustees where such membership might conflict with best interest of Mountain Land Rehabilitation.
- f. Questions regarding whether or not Board participation might present a conflict of interest should be discussed with a covered person's supervisor and referred to the Director of Corporate Compliance.

4. Standard 4.4 - Honoraria

Employees are, with the permissions of their supervisor, encouraged to participate as faculty and speakers at educational or community programs or functions. However, any honoraria shall be turned over to Mountain Land Rehabilitation *unless* the employee is not representing Mountain Land Rehabilitation at the function and the employee used personal time to attend the program or that portion of the program for which the honorarium is paid. All requests for participation at educational or community programs and functions shall be reported to the employee's supervisor or manager.

E. Principle 5 - Business Relationships

Business transactions with vendors, contractors and other third parties shall be transacted free from offers or solicitation of favors or other improper inducements in exchange for influence or assistance in a transaction.

The Standards set forth below are intended to guide key employees in determining the appropriateness of the listed activities or behaviors within the content of Mountain Land Rehabilitation business relationships, including relationships with vendors, providers, contractors, third party payors, and government entities. It is the intent of Mountain Land Rehabilitation that this policy be construed broadly to

avoid even the appearance of improper activity. If there is any doubt or concern about whether specific conduct or activities are ethical or otherwise appropriate, you should contact the Director of Corporate Compliance.

1. Standard 5.1 - Gifts and Gratuities

It is Mountain Land Rehabilitation's desire to, at all times, preserve and protect its reputation and to avoid the appearance of impropriety. A thing of "economic value" shall mean any thing having economic value except promotional items having no resale value. Employees shall not accept anything of economic value from any person or entity involved with Mountain Land Rehabilitation. Consequently,

- a. Gifts from Patients. Employees are prohibited from *soliciting* tips, personal gratuities or gifts from patients and from accepting monetary tips, gratuities or favors. Employees may accept gratuities and gifts having no economic value from patients. If a patient or another individual wish to present a monetary gift, he/she should be referred to Mountain Land Rehabilitation's Corporate Compliance Officer.
- b. Gifts Influencing Decision-making. Employees shall not accept gifts, favors, services, entertainment or other things of value to the extent that decision-making or actions affecting Mountain Land Rehabilitation might be influenced. Similarly, the offer or giving of money, services or other things of value with the expectation of influencing the judgment or decision-making process of any purchaser, supplier, customer, government official or other person by Mountain Land Rehabilitation is absolutely prohibited. Any such conduct must be reported immediately to the Director of Corporate Compliance.

- c. Gifts From Existing or Potential Vendors. Employees may retain gifts from vendors which have no economic value. If an employee has any concern whether a gift should be accepted, the employee should consult with his/her supervisor. To the extent possible, these gifts should be shared with the employees' co-workers. Employees shall not accept excessive gifts, meals, expensive entertainment, or other offers of goods or services which have economic value nor may they solicit gifts from vendors, suppliers, contractors, or other persons.
- d. Vendor Sponsored Entertainment. At a vendor's invitation, an individual may accept meals or refreshments at the vendor's expense. Occasional attendance at a local theater or sporting event, or similar entertainment at vendor expense may also be accepted. In most circumstances, a regular business representative of the vendor should be in attendance with the employee.

Nothing in this policy shall prohibit a department or supervisor from establishing stricter rules relating to the acceptance of gifts, gratuities or other things of value from vendors.

2. Standard 5.2 - Workshops, Seminars, and Training Sessions

Attendance at local, vendor sponsored workshops, seminars and training sessions are permitted. Attendance, at vendor expense, at out-of-town seminars, workshops, and training sessions is permitted only with the approval of an employee's supervisor.

3. Standard 5.3 - Contracting

Employees may not utilize "insider" information for any business activity conducted by or on behalf of Mountain Land Rehabilitation. All business relations with contractors must be conducted at arms' length both in fact and in appearance and in compliance with Mountain Land Rehabilitation's policies and procedures. Employees must disclose personal relationships and business activities with contractor personnel which may be construed by an impartial observer as influencing the employees' performance or duties. Employees have a responsibility to obtain clarification from management on questionable issues which may arise and to comply, where applicable, with Mountain Land Rehabilitation's conflict of interest policy.

4. Standard 5.4 - Business Inducements

Mountain Land Rehabilitation employees shall not seek to gain any advantage through the improper use of payments, business courtesies or other inducements. Offering, giving, soliciting, or receiving any form of bribe or other improper payment is prohibited.

Appropriate commissions, rebates, discounts, and allowances are customary and acceptable business inducements provided that they are approved by Mountain Land Rehabilitation management and that they do not constitute illegal or unethical payments. Any such payments must be reasonable in value, competitively justified, properly documented, and made to the business entity to whom the original agreement or invoice was made or issued. Such payments should not be made to individual employees or agents of business entities.

In addition, employees may provide entertainment and meals of nominal value to Mountain Land Rehabilitation customers, current, and prospective business partners and other persons when such activities have a legitimate business purpose, are reasonable and consistent with all applicable laws.

F. Principle 6 - Protection of Assets

All employees will strive to preserve and protect the corporation's assets by making prudent and effective use of Mountain Land Rehabilitation's property and resources and properly and accurately reporting its financial condition.

The Standards set forth below are intended to guide key employees by articulating Mountain Land Rehabilitation's expectations as they relate to activities or behaviors which may impact Mountain Land Rehabilitation's financial health or which reflect a reasonable and appropriate use of the assets.

1. Standard 6.1 - Internal Control

Mountain Land Rehabilitation has established control standards and procedures to ensure that assets are protected and properly used and that financial records and reports are accurate and reliable. All employees of Mountain Land Rehabilitation share the responsibility for maintaining and complying with required internal controls.

2. Standard 6.2 - Financial Reporting

All financial reports, accounting records, research reports, expense accounts, time sheets, and other documents must accurately and clearly represent the relevant facts or the true nature of a transaction. Improper or fraudulent accounting, documentation or financial reporting is contrary to the policy of Mountain Land Rehabilitation and may be in violation of applicable laws.

3. Standard 6.3 - Travel and Entertainment

Travel and entertainment expenses should be consistent with the employees' job responsibility and the organization's needs and resources. Employees are expected to exercise reasonable judgement in the use of Mountain Land Rehabilitation's assets and to spend the organization's assets as carefully as they would spend their own. Employees must also comply with Mountain Land Rehabilitation's policies relating to travel and entertainment expense.

4. Standard 6.4 - Personal Use of Corporate Assets

All property and business of the organization shall be conducted in the manner designed to further Mountain Land Rehabilitation's interest rather than the personal interest of an individual employee. Employees are prohibited from the unauthorized use or taking of Mountain Land Rehabilitation's equipment, supplies, materials, or services. Prior to engaging in any activity on company time which will result in remuneration to the employee or the use of Mountain Land Rehabilitation's equipment, supplies, materials, or services for personal or non-work related purposes, employees shall obtain the approval of the appropriate business unit or other management of Mountain Land Rehabilitation.

PROCEDURE

Policies of Mountain Land Rehabilitation will support and be in compliance with this Code of Conduct.

- A. Mountain Land Rehabilitation expects each person to whom this Code of Conduct applies, to abide by the Principles and Standards set forth herein and to conduct the business and affairs of Mountain Land Rehabilitation in a manner consistent with the general statement of principles set forth herein.
- B. Failure to abide by this Code of Conduct or the guidelines for behavior which the Code of Conduct represents may lead to disciplinary action. For alleged violations of

the Code of Conduct, Mountain Land Rehabilitation will weigh relevant facts and circumstances, including, but not limited to, the extent to which the behavior was contrary to the express language or general intent of the Code of Conduct, the egregiousness of the behavior, the employee's history with the organization, and other factors with Mountain Land Rehabilitation deems relevant. Discipline for failure to abide by the Code of Conduct may, in Mountain Land Rehabilitation discretion, range from verbal correction to termination.

- C. Nothing in this Code of Conduct is intended to, nor shall be, construed as providing any additional employment or contract rights to employees or other persons.
- D. Mountain Land Rehabilitation reserves the right to modify, amend or alter the Code of Conduct without notice to any person or employee. Mountain Land Rehabilitation will generally attempt to communicate changes concurrent with or prior to the implementation of such changes. An updated, complete copy of the Code of Conduct is available upon request at any time in the Human Resources department.

**MOUNTAIN LAND REHABILITATION
REQUIRED COMPETENCY
ORGANIZATIONAL CODE OF ETHICAL BEHAVIOR AND ETHICS COMMITTEE**

GOAL

The employee will understand the ethical commitment of Mountain Land Rehabilitation.

OBJECTIVE

Upon completion of this Competency the employee will understand that Mountain Land Rehabilitation operates under an Organizational Code of Ethical Behavior which includes beliefs and commitments to patients, community, employees, values, and physicians; when and how to access the Ethics Committee; and that there are general guidelines for handling issues of employee/staff rights.

REFERENCE

ORGANIZATIONAL CODE OF ETHICAL BEHAVIOR

1. The operation of Mountain Land Rehabilitation will be accomplished in accordance with our ethical values and our deep commitment to the community. These commitments include additional values essential to our missions. Mountain Land Rehabilitation extends quality health care services to all individuals without discrimination toward any.
2. The Organization Code of Ethical Behavior includes beliefs and commitments to patients, community, employees, values, and identified policies which support these commitments.

STATEMENT OF ETHICAL COMMITMENTS

Mountain Land Rehabilitation is committed to acting in accordance with the following beliefs and commitments:

1. Commitment to Our Patients
 - a. We believe that our patients' needs, expectations, and rights most clearly stated in the Patients' Rights document, as our highest priorities.
 - b. We believe in recognizing and respecting the unique familial, social, ethnic, cultural, emotional, and spiritual needs and values of our patients and their families.
 - c. We believe and support the rights of individual, caregivers and families to make informed decisions in the ethical provision of health care.
 - d. We believe in the individuals' right to dignity, respect, and self-determination, to include the right to perform or refuse to perform tasks for Mountain Land Rehabilitation.
 - e. We believe those who receive our care should also receive confidential treatment of information pertaining to them and their care.
 - f. We believe in the right of the individual, families, and caregivers to assist in resolving ethical issues and conflicts arising in the provision of care, and to this end provide structures and processes for such discussions.

- g. We believe in fair and understandable billing, seeking payment only for services actually rendered, assessing charges at reasonable rates, having auditing procedures to ensure accurate billing, and responding to billing questions courteously, quickly, helpfully, and justly.
- h. We believe that conflicts of interest can adversely affect the effective delivery of health care to our customers and therefore will make every effort to discover and ethically deal with these.

2. Commitment to Our Community

- a. We believe it is our responsibility to provide accessible health care.
- b. We believe it is our duty to be financially responsible in the structure and delivery of health care service.
- c. We believe it is our responsibility to contribute to the improvement of the general health and wellness of our community and environment through a continuum of care, effective community education, and continuous improvement of our services.
- d. We believe that we should advertise only those services which we can actually provide in a quality manner, and this should be done in a non-deceptive, truthful way.
- e. We believe that it is our responsibility to provide care to those who are in need, within the reasonable bounds of fiscal responsibility.
- f. We believe that it is our responsibility to be a good corporate citizen by conducting business in a manner that is in the mutual best interest of Mountain Land Rehabilitation and the community we serve.
- g. We believe that appropriate and ethical partnerships with customers are essential to our future.

3. Commitment to Our Employees

- a. We believe employees deserve a safe work environment that fosters interdependence, teamwork, innovation, initiative, and opportunities for growth through personal and professional support, training, and development.
- b. We believe in a climate of mutual trust and respect promoted through processes of fair evaluation, equitable compensation, ongoing support and consistent recognition of behavior which enhances our core values.
- c. We respect diversity of employees' gifts and talents, and we believe in each employee's unique ability to contribute toward quality patient care.
- d. We believe in fostering an environment that allows employees to serve patients with a compassionate attitude and caring spirit.
- e. We believe employees are entitled to a clear understanding of their roles and the information necessary for informed decision-making and planning.
- f. We believe that employees are to be treated with respect and that there is a just process for prompt and impartial consideration of differences.
- g. We believe in working in an environment of collaboration and teamwork with our medical community.
- h. We believe in providing a quality workplace (physically, technologically, and clinically) for our employees to enhance the provision of patient care.
- i. We support and encourage continuing education for all employees.

4. Commitment to Our Values

- a. We believe that the essence of “Enhancing Potential” is accomplished through prudent decisions and actions which result in a system that is stronger and better positioned for future generations.
- b. We believe it is our responsibility to manage our resources efficiently.
- c. We care deeply about the community of which Mountain Land Rehabilitation is an integral part and are committed to its long-term viability.
- d. We believe in creating our future through openness to self-evaluation and evaluation of new concepts and ideas that can enhance our vision as the community’s rehabilitation system of choice.

ETHICS COMMITTEE

1. Guidelines are established for the proper handling and resolution of legitimate staff rights issues.
2. Priority for Employee Rights is in the following sequence of importance:
 - a. Safety, care, and rights of the patients;
 - b. Safety of the visitors, the staff, the facilities, and the community;
 - c. Compliance with legislation, regulations, rules, standards, policies, and guidelines of the Federal Government and its agencies, the State and local government and agencies, the CARF, the JCAHO, the Board of Directors, and Facility Administration;
 - d. Confidentiality of the patients, Mountain Land Rehabilitation, and the staff;
 - e. The staff’s legitimate cultural, religious, ethical, and personal values, which directly affect patient care or Mountain Land Rehabilitation operations;
 - f. The needs of Mountain Land Rehabilitation;
 - g. The staff’s legitimate cultural, religious, personal values, wages, salaries, and working conditions (including safety issues) that do not affect patient care or Mountain Land Rehabilitation operations;
 - h. The personal preferences of the staff.

Name: _____

Date: _____

Department: _____

**Mountain Land Rehabilitation
REQUIRED COMPETENCY
ORGANIZATIONAL CODE OF ETHICAL BEHAVIOR and ETHICS COMMITTEE**

Indicate which Commitment is demonstrated by checking the appropriate box(es).

When changing a policy which affects patients, knowledgeable individuals in the field are consulted for suggestions.

We conduct a Health Fair.

As employees we strive to provide quality service.

We appreciate the unique contribution that each employee makes to the organization.

We access information only on a "need to know" basis.

Mountain Land Rehabilitation makes fiscally sound decisions.

Universal precautions are required and appropriate equipment is provided without cost to the employee.

Patients and their families receive education on what to do when the patient is released from the care of Mountain Land Rehabilitation.

Employees are provided a job description.

The Ethics Committee exists to provide information, guidelines, and advice to the:

Requests for consultation of the Ethics Committee are: **mandatory / voluntary** (Select one)

The opinions and recommendation of the Ethics Committee are:
advisory / authoritarian / non-binding / compulsory (Select two)

List two ways to consult the Ethics Committee:

The first priority for Employee Rights is _____, _____, and _____ of the _____.

I have reviewed Mountain Land Rehabilitation Policies on the Organizational Code of Ethical Behavior, the Ethics Committee, and Employee/Staff Rights. I understand that Mountain Land Rehabilitation has Commitments to Patients, Community, Employees, Values and that I am responsible for respecting these Commitments. As an employee of Mountain Land Rehabilitation, I have rights which are defined by policy. I further understand that I may access the Ethics Committee for advice on any Ethical Dilemma.

Employee's Signature _____ Date _____

Supervisor Signature _____ Date _____

	PATIENTS	COMMUNITY	EMPLOYEES	VALUES
When changing a policy which affects patients, knowledgeable individuals in the field are consulted for suggestions.				
We conduct a Health Fair.				
As employees we strive to provide quality service.				
We appreciate the unique contribution that each employee makes to the organization.				
We access information only on a "need to know" basis.				
Mountain Land Rehabilitation makes fiscally sound decisions.				
Universal precautions are required and appropriate equipment is provided without cost to the employee.				
Patients and their families receive education on what to do when the patient is released from the care of Mountain Land Rehabilitation.				
Employees are provided a job description.				