



POLICY REVIEWS

The purpose of this CBL is to familiarize Vail Valley Medical Center (VVMC) employees with the following policies:

- **Equal Employment Opportunity (EEO)**
- **Harassment**
- **Solicitation and Distribution**
- **Code of Conduct**

Employees should contact their Director or **Human Resources (970-569-7501 or 970-569-7502)** with questions or concerns regarding these policies.



**POLICY TITLE: Equal Employment Opportunity
(EEO)**

POLICY NO: 1.001

POLICY:

Vail Valley Medical Center is an equal opportunity employer. It is the hospital's policy to ensure that all applicants and employees are treated in accordance with all applicable laws.

Illegal discrimination is strictly prohibited. All personnel actions are made without regard to race, color, religion, national origin, sex, sexual orientation, disability, citizenship, age or other legally protected classes.

Personnel actions including but not limited to recruitment, employment, training, transfers, promotions, demotions, disciplinary actions, terminations and benefits are based on qualifications, performance and other job related factors.

Equal Employment Opportunity (EEO) [cont.]

COMMENT:

It is the responsibility of all employees to maintain a work environment that is free from discrimination. Any employee found in violation of this policy is subject to disciplinary action up to and including termination.

An employee who feels they have been treated in a manner contrary to this policy should immediately report the incident to their manager or **Human Resources (970-569-7501 or 970-569-7502)**.

Each complaint will be investigated. Based on the information obtained during the investigation, appropriate corrective action will be taken, if warranted.

An accused violator, or any other employee, may not retaliate against any employee or applicant for making a complaint regarding a personnel action that is alleged to be contrary to our Equal Employment Opportunity policy.

Human Resources (970-569-7501 or 970-569-7502)



Vail Valley Medical Center

Extraordinary people. Extraordinary care.

POLICY TITLE: Harassment

POLICY NO: 1.005

POLICY:

It is the policy of the Vail Valley Medical Center to promote a productive work environment and not to tolerate verbal or physical conduct by any employee which harasses, disrupts, or interferes with another's work performance or which creates an intimidating, offensive, or hostile environment because of that employee's protected status based on age, race, national origin, religion, disability, sex, sexual orientation, veteran's status, pregnancy, exercise of rights under the Family and Medical Leave Act for reporting or disclosing a concern about: patient safety; quality of care; or compliance with a law or regulation is strictly prohibited.

COMMENT:

All employees are expected to act in a positive manner and contribute to a productive work environment that is free from harassing or disruptive activity. No form of verbal, physical or sexual harassment will be tolerated. No employees in a supervisory position may threaten or insinuate, either explicitly or implicitly, that an employee's refusal or willingness to submit to sexual advances will affect the employee's terms, conditions or employment.

Harassment [cont.]

Other harassing or offensive conduct in the work place committed by any employees or non-employees is also prohibited. Such conduct would include:

- a) sexual flirtations, touching, advances, or propositions;
- b) verbal abuse of a sexual nature;
- c) graphic or suggestive comments about an individual's dress or body;
- d) sexually degrading words to describe an individual;
- e) the display in the work place of sexually suggestive objects or pictures, including nude photographs;
- f) verbal or physical abuse based on an employee's age, race, national origin, religion, disability, sex, veteran's status, pregnancy, exercise of rights under the Family and Medical Leave Act or
- g) verbal or physical abuse for reporting or disclosing a concern about: patient safety; quality of care; or compliance with a law or regulation.

Any employee who believes that a supervisor's, another employee's, or a non-employee's actions or words constitute unwelcome harassment has a responsibility to report or complain about the situation immediately. Such report or complaint should be made to the employee's department director or **Human Resources (970-569-7501 or 970-569-7502)** if the complaint involves the director.

Harassment [cont.]

All complaints will be investigated promptly in an as impartial and confidential manner as possible. Employees are required to cooperate in any investigation. A timely resolution of each complaint should be reached and communicated to the parties involved. Retaliation against any employee for filing a complaint or participating in an investigation is strictly prohibited.

Any employee, supervisor, or manager who is found to have engaged in harassment of another employee or who has retaliated against another employee for filing a complaint or participating in an investigation will be subject to appropriate disciplinary action up to and including termination.

Human Resources (970-569-7501 or 970-569-7502)



POLICY TITLE: Solicitation and Distribution
POLICY NO: 6.003

PURPOSE:

To set forth the circumstances under which solicitation and distribution of literature, merchandise, or services unrelated to the medical center can occur.

POLICY:

Vail Valley Medical Center prohibits solicitation and distribution on its premises by non-employees and permits solicitation and distribution by employees only as outlined below.

Vail Valley Medical Center limits solicitation and distribution on its premises because such activities can interfere with the normal operation of the organization, can be detrimental to employee efficiency, can be disturbing to patients and visitors, and can pose a threat to security.

Individuals not employed by the medical center are prohibited from soliciting funds or signatures, conducting membership drives, distributing literature or gifts, offering to sell merchandise or services (except by representatives of suppliers properly identified), or engaging in any other solicitation, distribution, or similar activity on all hospital properties.

Solicitation and Distribution [cont.]

VVMC will permit employees to engage in solicitation or distribution of literature for any group or organization, including charitable organization, only in accordance with the following restrictions. Employees may be subject to disciplinary action if these restrictions are not followed.

- a) The sale of any merchandise is prohibited on all medical center premises.
- b) Solicitation and distribution of literature are prohibited during the working time of either the employee making the solicitation or distribution, or the targeted employee. The term “working time” does not include an employee’s authorized lunch or rest periods.
- c) Distribution of literature is prohibited in work areas and patient care areas at all times. Patient care areas include but are not limited to operating rooms, treatment rooms, patient rooms, the corridors and sitting areas adjacent to patient rooms and treatment rooms, and in elevators used by patients and families.
- d) The distribution of literature in such a manner as to cause litter on VVMC property is prohibited.
- e) Off-duty employees are not to return to the interior or working areas of VVMC for the purposes of solicitation or distribution until their next working time, except as a customer.

Solicitation and Distribution [cont.]

The medical center may authorize a limited number of fund raising drives on behalf of charitable organizations or events. Employees are encouraged to assist and support these drives. However, employees will not be discriminated against because of their willingness or unwillingness to participate.

VVMC maintains bulletin boards to communicate medical center information to employees and to post notices required by law. Any material to be posted on medical center bulletin boards must be approved by Administration or Human Resources in advance. Unauthorized posting of notices, photographs, or other printed or written materials on bulletin boards or other medical center property is prohibited.

Employees should make their Director or **Human Resources (970-569-7501 or 970-569-7502)** aware of violations of this policy.



POLICY TITLE: Code of Conduct/Organizational Ethics

POLICY NO: (Administration) 871.61

PURPOSE:

Vail Valley Medical Center has an outstanding reputation for integrity, to which its Board of directors, medical staff, employees and volunteers have contributed. This reputation enables the organization to fulfill its mission of service to patients and community. To help preserve and protect these high standards, the Medical Center has adopted and prescribes to a Code of Conduct.

The purpose of this policy is to define the organization's position regarding matters of integrity in patient care and business practices and to provide guidelines that will assist the board of directors, medical staff, employees, volunteers, suppliers, consultants and others in making appropriate personal judgments when dealing with integrity and ethics issues that arise in the course of service at the medical center.

Code of Conduct/Organizational Ethics [cont.]

POLICY:

1. The Medical Center and those acting on its behalf will abide by the letter and spirit of all applicable federal state and local laws. No illegal action by anyone, regardless of intent to benefit any patient or the medical center will be permitted or sanctioned. Anyone with a conflict of interest, be it in patient care or business practice, will declare the same.
2. The medical center and those acting on its behalf will act fairly and honestly in all matters. Any errors or misunderstandings occurring with patients, vendors, governmental agencies or others will be corrected as quickly as possible.
3. The medical center is dedicated to providing medically necessary care to patients without regard to race, creed, color, national origin, gender, economic status, disability or personal attributes. Physicians and staff have the obligation to provide services with respect for human dignity and uniqueness of each patient, Each caregiver is expected to conduct him/herself in accordance with the highest ethical standards of one's profession.
4. Admissions, transfers and discharges are made in accordance with clinical need and with applicable laws and regulations.

Code of Conduct/Organizational Ethics [cont.]

5. The medical center will provide education and training concerning Medicare, Medicaid, and hospital regulations to its board of directors, medical staff, employees, volunteers, suppliers, consultants, and others with the expectation that all these individuals will become familiar with the regulations that apply to their work and will seek guidance when unsure of appropriate action to take under these regulations.
6. Those acting on behalf of the medical center have not only the right but the personal responsibility to resolve any doubts or uncertainties that they may have relation to the integrity or ethics that arise in the course of their duties. Administrators, directors and managers are responsible for ensuring that personnel within their supervision are in compliance with this code of conduct and in creating an environment where individuals feel comfortable in raising issues concerning integrity and ethics.
7. Business practices, including but not limited to marketing, purchasing and materials management, are conducted in an honest and ethical manner.
8. Billing of patient charges and resolution of conflict associated with patient billing will be conducted in an honest and ethical manner.

Code of Conduct/Organizational Ethics [cont.]

PROCEDURE:

A. When questions of conduct/ethics arise, the healthcare provider should refer the matter as follows:

1. *Medical Staff and/or Allied Health Professionals (AHP)*: Questions arising the management of patient care should be initially directed to the individual care provider involved. IF further analysis is warranted, the department director and/or the physician's section head should be contacted. Any action beyond this initial reporting will be taken in accordance with the procedural guidelines stated in the Medical Staff Bylaws.
2. *Nursing Personnel*. Questions regarding the delivery of patient care by nursing personal shall be initially directed to the individual care provider involved. If further analysis is warranted, the department director or vice president of clinical services should be notified. Any action beyond this initial reporting will be taken in accordance with the hospital's Human Resources Personnel policies and procedures.
3. *Other Healthcare Providers*. Questions regarding the delivery of patient care services by other healthcare providers shall be initially director to the individual care provider involved. If further analysis is warranted, the department director or appropriate vice president should be contacted. Any action beyond this initial reporting will be taken in accordance with the hospital's Human Resources Personnel policies and procedures.

Code of Conduct/Organizational Ethics [cont.]

- B. When questions of an ethical nature arise regarding conflict in the provision of patient care, patients, their significant others or other members of the public shall have access to the organization's Ethics Resource Committee (see policy #871.06).

- C. When questions related to business practices arise, they shall be referred to the appropriate department head, vice president and/or Compliance Officer.

- D. By policy, patient bills are itemized and include dates of services. Upon admission, all patients and families are informed of the organization's process to review patient or payor questions about charges expeditiously and to resolve a conflict or discuss a question whether real or perceived harassment. When questions arise about patient billing, they shall be referred to the department manager for initial review. If further analysis is warranted, the department director and/or vice president will be contacted.

Human Resources (970-569-7501 or 970-569-7502)



HR Policy Review Acknowledgement

I acknowledge that I reviewed the VVMC Equal Employment Opportunity, Harassment, Solicitation and Distribution and Code of Conduct policies.

If I have questions or concerns regarding these policies, I will contact the person recommended in the policy and/or the VVMC Human Resources Department.

Name (printed)

Name of Sponsoring MD

Signature

Date

Please return completed form to the VVMC Human Resources Department.