



Code of Conduct

October 2015

Our Commitment to Compliance and Integrity

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INTRODUCTION

Broward Health is a fully integrated healthcare system operated by the North Broward Hospital District. As one of the top ten largest safety net systems in the United States, we thrive on delivering the best evidence-based care to our patients. Accordingly, we are focused on developing our healthcare workforce to create clinicians for the future. We support cutting-edge research to provide hope for all who need state-of-the-art therapies and we treat all of our patients as if they are a member of our own family and provide warm, compassionate care to each and every patient.

At Broward Health, we know that our commitment to deliver excellent care to our patients requires a commitment by our entire workforce to do things the right way. We must function as a team, and we must be many things at once. Therefore, we have adopted this Code of Conduct to reflect our values and demonstrate our commitment to meeting the highest standards of compliant and ethical conduct. Our Code of Conduct rests on our commitments to quality, standards, honesty and integrity, transparency, our team, creativity, compassion, and compliance and ethics. It also puts our values into action by giving us a roadmap for prioritizing these principles.

This Code of Conduct has been adopted by the Board of Commissioners to guide each of us in the decisions we must make on a daily basis, but we know that many situations can get complicated, and we have developed a comprehensive Corporate Compliance and Ethics Program to provide additional guidance where it is needed. We also have developed detailed policies and procedures to address specific subjects. Although this Code of Conduct and the related policies and procedures address many of the laws and issues we frequently encounter, it is the responsibility of each member of our team to know, understand, and follow all federal and state laws and regulations that relate to the work he or she does.

Commitment to the goals of our Corporate Compliance and Ethics Program by each member of our team allows us to be the best at what we do, and so we require each member of our team to comply with this Code of Conduct and the laws, regulations, and policies it incorporates. Participation by every single individual at Broward Health is necessary in order for us to uphold our legal and ethical standards. By committing to the standards outlined in this Code of Conduct, we can continue our mission to provide the best care in the best way possible.

Mission Statement

The mission of Broward Health is to provide quality healthcare to the people we serve.

Vision Statement

Our Charter commissions us to operate our hospitals in service of the public good, and we aim to provide world-class healthcare to all we serve. In serving the healthcare needs of our patients, we care for all.



PURPOSE AND SCOPE OF THE CODE OF CONDUCT

Broward Health's Code of Conduct provides guidance that applies to everyone at Broward Health, including each and every employee, Board member, medical staff member, contractor, subcontractor, agent, and any other person who provides patient care items or services or who performs billing or coding functions for Broward Health. As it is used in this Code, the term "workforce member" means any employee, independent contractor, agent, volunteer, trainee, or other person who performs work for or on behalf of Broward Health. This includes full-time, part-time, and pool employees; associates; directors; officers; managers; supervisors; volunteers; members of the Board of Commissioners and members of standing committees; medical staff employed by or otherwise affiliated with Broward Health; medical students and all other affiliated students or others receiving training at any Broward Health facility; and others who provide goods or services to Broward Health.

The Code of Conduct establishes the general policies and procedures all workforce members must follow as a condition of employment or for providing services to Broward Health. The Chief Compliance and Privacy Officer and/or the Chief Ethics Officer may need to provide further guidance on some complex issues, and may provide additional guidance when questions arise. If there is ever a situation where you feel that following this Code would lead to an incorrect or unethical result, you should contact the Chief Compliance and Privacy Officer at 954.473.7500 or the Chief Ethics Officer at 954.473.7487.

COMMITMENT TO THE GOALS OF OUR CORPORATE COMPLIANCE AND ETHICS PROGRAM BY EACH MEMBER OF OUR TEAM ALLOWS US TO BE THE BEST AT WHAT WE DO, AND SO WE REQUIRE EACH MEMBER OF OUR TEAM TO COMPLY WITH THIS CODE OF CONDUCT AND THE LAWS, REGULATIONS, AND POLICIES IT INCORPORATES. PARTICIPATION BY EVERY SINGLE INDIVIDUAL AT BROWARD HEALTH IS NECESSARY IN ORDER FOR US TO UPHOLD OUR LEGAL AND ETHICAL STANDARDS.

OUR COMMITMENT TO QUALITY

Providing Quality Care to Those We Serve

At Broward Health, we know that delivering the highest quality care starts with our relationships with our patients. Delivering excellent, patient-centered care means that in addition to providing good medical care, we protect patient rights and make sure they are a central part of the decision-making process. We also support cutting-edge science to be able to develop and implement evidence-based medicine that takes advantage of the latest technologies and advances in treatment.

We consistently seek to assess our own performance across a number of quality indicators, and always strive to improve. Our Quality Assessment and Oversight Committee helps to direct and maintain performance improvement, and sets system-wide expectations for performance improvement. We also support targeted initiatives to improve specific problems and encourage innovation at all levels in order to meet quality standards.

Patient Rights

Workforce members are expected to provide patient care in a manner that respects and promotes the rights of all patients at Broward Health. Patients have a right to healthcare at Broward Health without regard to age, gender, sexual orientation, gender identity or expression, national origin, race, ethnicity, cultural language, physical or mental disability, or religious background. Broward Health will not discriminate against any patient, regardless of his or her source of payment.

Upon admission, each patient—or when appropriate, the patient's representative—will receive a written copy of the patient's rights

and responsibilities. Patient rights include but are not limited to the following:

- **The right to participate in the healthcare process, and freedom from care provided without the patient's informed consent:**
 - **This includes the right to participate in the development and implementation of his or her plan of care, including the provision of advance directives to providers.**
 - **This also includes the right to receive information about the risks, benefits, and alternatives to particular treatments and procedures. Further, patients have the right to full and complete information about the outcomes of any care or treatment received.**
- **The right to choose among providers of goods and services.**
- **The right to a safe environment and freedom from any form of abuse or harassment.**
- **The right to privacy and confidentiality, including the right to receipt of the Notice of Privacy Practices.**
- **The right to accommodations free of charge for vision, speech, hearing, cognitive impairments, or language translation.**
- **The right to pain management.**
- **The right to receive detailed information about the bill for services, regardless of the form or source of payment.**
- **The ability to request an accounting of disclosures, a restriction of use or disclosure of protected health information, and an amendment to the medical record.**

License and Certification Renewals

Workforce members and other individuals in positions that require professional licenses, certifications, or other credentials are responsible for maintaining the current status of their credentials and shall comply at all times with federal and state requirements applicable to their respective disciplines and scope of responsibilities as defined by Broward Health.

Therefore, you must:

- **Only provide professional services that require a license, certification, or registration if you have the required license or credential and those services are within the scope of responsibilities as defined by Broward Health.**
- **Keep any required licenses or professional credentials up-to-date, and be able to provide evidence of your current, active license or credentials. Broward Health will not allow any workforce members to work without a valid license or credentials.**
- **If your license is revoked or suspended, or if the state or federal government takes any action to restrict your license or your ability to practice on any level, including with respect to particular types of patients, you must immediately report it to a supervisor and Human Resources. Further, if you become aware of someone whose license has been restricted or suspended in any manner, you have a duty to report that restriction or suspension to their supervisor, Human Resources or the Chief Compliance and Privacy Officer.**

If a workforce member has any concerns, he or she should contact a supervisor, Human Resources, or the Chief Compliance and Privacy Officer.



Our Commitment to Compliance and Integrity

OUR COMMITMENT TO STANDARDS

We hold ourselves to the highest compliance and ethical standards, and always work to make sure that our conduct is permissible by law. This requires our commitment to understanding and following the federal and state laws that govern our activities.

Physicians and Other Potential Referral Sources

Financial Relationships

There are both federal and state laws and regulations which govern the relationship between healthcare providers and physicians who may refer patients to their facilities. Especially important among these laws and regulations are the Stark Law and the Anti-Kickback Statute:

- **The Stark Law addresses concerns that physicians who self-refer may be overusing items and services paid for by Medicare (and in some cases, Medicaid) for their own financial gain. It prohibits a physician from referring a patient for designated health services paid for by Medicare or Medicaid to an entity with which the physician, or his immediate family member, has a financial interest.**
- **The Anti-Kickback Statute prohibits offering, paying, soliciting, or receiving anything of value to induce or reward referrals or otherwise generate business for a Federal healthcare program. This law covers referrals from anyone, not just physicians, and covers any items or services for which payment may be made by a Federal healthcare program.**

Broward Health does not pay for referrals or accept payments for referrals under any circumstances. Further, to help our workforce members comply with these laws, Broward Health has established policies and procedures regarding financial relationships, including

ownership and compensation arrangements between Broward Health and physicians and other referral sources. All agreements for payment or receipt of anything of value with physicians or their immediate family members must be in writing and must comply with the specific provisions of both laws and Broward Health's policies and procedures. Agreements must also be reviewed and approved by the General Counsel's Office, the Corporate Compliance Department, Operations, and in some cases, the Board. Side agreements—those that modify a formal contract—are not permitted.

In addition to being appropriately structured, financial relationships with physicians and other sources of referrals must be closely tracked to make sure that they are carried out as agreed.

Workforce members that are involved in arrangements with physicians, particularly those responsible for making payments to physicians, providing space or services to physicians, and recruiting physicians to the community must be especially aware of the requirements of the laws, regulations, and policies that address these relationships.

Failure to meet all requirements of these laws and regulations can result in serious consequences for Broward Health. It is therefore important to remember the following:

- **We do not accept payments for referrals we make. No Broward Health workforce member or individual acting on behalf of the organization is permitted to solicit or receive anything of value, directly or indirectly, in exchange for the referral of patients. Similarly, when making patient referrals to another healthcare provider, we do not take into account the volume or value of referrals that the provider has made (or may make to us).**

- **We do not pay for referrals. We accept patient referrals and admissions based solely on the patient's medical needs and our ability to render the needed services. We do not pay or offer to pay anyone, be it workforce members or other persons or entities, for referrals of patients.**
- **All payments made to physicians and or other entities must be made in connection with current, signed written agreements. Payments must also be commercially reasonable and within the fair market value for the actual services performed, and must be supported by all required documentation (e.g., certification of hours of service).**

Business Courtesies with Physicians and Potential Referral Sources

Any entertainment, gift, or token of appreciation involving physicians or other persons who are in a position to refer patients to Broward Health or any of its affiliated entities can only be offered or accepted in accordance with our policies and procedures. Workforce members must consult our policies and procedures before extending or receiving any business courtesy or token of appreciation to or from a potential referral source.



Our Commitment to Compliance and Integrity

Other Laws and Regulations

Emergency Medical Treatment and Active Labor Act (EMTALA)

We follow the federal Emergency Medical Treatment and Active Labor Act (EMTALA) and applicable Florida law on access to emergency services in providing an emergency screening examination and necessary stabilization to all patients, regardless of their ability to pay. This means that we treat anyone with an emergency medical condition, including active labor, provided we have the capacity and capability to care for the patient. We will not delay the medical screening and necessary stabilizing treatment in order to seek financial and demographic information. We do not admit, discharge, or transfer patients with emergency medical conditions simply based on their ability or inability to pay or any other discriminatory factor.

Patients with emergent medical conditions are only transferred to another facility at the patient's request or if the patient's medical needs cannot be met at the medical center and appropriate care is available at another facility.

Health Insurance Portability and Accountability Act (HIPAA) and Breach Notification Rule

We collect information about a patient's medical condition, history, medication, and family illness to provide quality care. The Federal Health Insurance Portability and Accountability Act (HIPAA), also known as the Privacy Rule, creates protections for personal health information held by covered entities and gives patients a number of rights with respect to that information. We also comply with all Florida

laws related to patient privacy and confidentiality. In following these privacy laws and regulations, we do not use, disclose, or discuss patient-specific information with others unless it is necessary to serve the patient or is required by law. Workforce members may never use or disclose confidential information that violates the privacy rights of patients. Should you have additional questions about how and when you can use personal health information, contact the Chief Compliance and Privacy Officer at (954) 473-7500.

False Claims Act and Deficit Reduction Act

The Federal False Claims Act (FCA) and Deficit Reduction Act protect Federal healthcare programs including Medicare, Medicaid, and TRICARE from fraud, waste and abuse. The government enacted the FCA to prohibit knowing submission of false or fraudulent claims to the federal government. The Deficit Reduction Act gives states additional flexibility to update their Medicaid programs and combat fraud, waste and abuse. In addition, the Florida False Claims Act deters persons from knowingly causing or assisting in causing the state government to pay claims that are false or fraudulent. Both statutes provide remedies for obtaining treble damages and civil penalties when money is obtained from the federal or state government because of a false or fraudulent claim.

Broward Health complies with these laws and all related regulations, and has policies to detect, report, and prevent fraud, waste and abuse, as well as to provide protection for whistleblowers. All workforce members should report suspected improper conduct consistent with the Broward Health reporting policies and procedures.

Antitrust Laws

Antitrust laws are designed to create a level playing field in the marketplace and to promote fair competition. Discussing Broward Health's business—such as how prices are set, or the terms of vendor relationships—with a competitor can result in a violation of these laws. Workforce members need to be mindful when at outside meetings to not participate in discussions regarding these types of prohibited subjects.

Accreditation and Surveys

A key component of establishing our reputation for quality is participating in the accreditation process. In preparation for, during, or after surveys, Broward Health workforce members must deal with all accrediting and external survey bodies (such as The Joint Commission) in a direct, open, and honest manner. Likewise, when government agencies conduct surveys, we must respond with openness and accurate information. Workforce members must never conceal, destroy, or alter documents, even if they relate to a possible violation of law. All the information we provide to accrediting or other surveying bodies must be accurate and not misleading.

Environmental Standards

Broward Health is committed to providing a safe and secure environment for patients, family members, workforce members, visitors, and customers. We comply with established safety and infection control laws and regulations, which are intended to prevent

job-related hazards. We are consistent with ergonomic standards and maintain a safe work environment.

We are respectful of the environment and conserve natural resources. We exercise our policies and procedures with regard to the environment and use Broward Health buildings, property, laboratory processes, and medical products in accordance with federal, state, and accreditation standards. We comply with permit requirements that allow for the safe discharge of pollutants into the air, sewage systems, water, or land. We comply with all laws and regulations governing the handling, storage, use, and disposal of hazardous materials, infectious wastes, and other pollutants.



Our Commitment to Compliance and Integrity

100%

OUR COMMITMENT TO HONESTY & INTEGRITY

Fraud, Waste and Abuse

Our legal obligation to not submit false or fraudulent claims to the government coincides with our ethical obligation to only bill for the services we actually provide. Engaging in any form of fraud, waste, or abuse will not be tolerated at Broward Health and may also be prosecuted under federal law, resulting in the imposition of restitution, fines, and in some instances, imprisonment. Violations of federal or state law related to fraud, waste, and abuse may also result in a range of administrative sanctions (such as exclusion from participation in Medicare, Medicaid, and Federal healthcare programs) and civil monetary penalties.

The following are some examples of fraud, waste, or abuse:

- **False documentation of a diagnosis or procedure code to obtain a higher rate of reimbursement.**
- **Forging or changing patient-billing related items such as making false claims or billing for services or supplies not rendered, not medically necessary, or not documented.**
- **Misrepresenting a diagnosis or procedure code in order to obtain payment.**
- **Alteration or forgery of checks.**
- **Any misuse or theft of funds.**
- **Falsifying or altering any record or report such as an employment application, payroll or time record, expense account, medical record, or patient record.**
- **Falsely reporting costs.**

We can help prevent and detect fraud, waste, and abuse by performing routine audits, monitoring, and reviews, along with establishing internal controls. Your participation is essential in helping us to identify problems in this area. If you know or suspect activity of this nature, report it immediately. If you are uncertain whether any activity is inappropriate, contact the Chief Compliance and Privacy Officer or the Chief Ethics Officer for guidance.



Time Reporting

Workforce members who submit time reports must be diligent in submitting a complete, accurate, and timely report and ensure that hours and costs are applied to the appropriate expense account. The signature (manual or electronic) on a time report is a representation that the time accurately reflects the number of hours worked. The approver's signature on a time report or expense report is a representation that it has been reviewed and that steps have been taken to verify the validity of the hours or expenses. Failure to comply with accurate and timely reporting constitutes falsification of time records and may result in dismissal.

Gifts and Entertainment

Our services and business relationships are solely to promote the best interests of Broward Health and Broward Health's patients; as a result we cannot offer or accept anything of value in exchange for referrals or business. Workforce members are prohibited from accepting gifts, payments, and fees for services, discounts, valuable privileges, or other favors that would or might appear to influence them in the performance of their duties. Gifts must never be given to or received from a referral source with the intent of inducing referrals or in a manner that could give the appearance of intending to induce referrals. A "referral source" is defined as an entity or individual that does or might direct patients or healthcare items and services to Broward Health.

- **When we receive a gift that is not allowed by policy, the gift should be graciously returned to the donor and reported to the Chief Compliance and Privacy Officer or the Chief Ethics Officer. If the donor refuses to take the gift back, the workforce member must contact the Chief Compliance and Privacy Officer or the Chief Ethics Officer immediately for further direction.**
- **A gift is any item of value, including everything ranging from a marketing item such as a t-shirt or a pen to candy or flowers, if the recipient is not expected to pay for the item.**
- **Cash, gift cards, travelers checks, money orders, honorariums, or other cash equivalents received from patients, vendors, customers, physicians, or government officials are not permitted. Perishable items (such as food, popcorn, etc.) may be accepted on special occasions (e.g., during the holiday season) as long as they are infrequent, appropriate, modest, reasonable, and shared among the entire department, consistent with Broward Health policies and procedures.**

Relationships with Public Officials

Broward Health will comply with all applicable laws and regulations. We will abide by Florida statutory requirements that ensure that public officials and workforce members conduct themselves independently and impartially, and do not use their offices or positions for private gain other than remuneration provided by law and avoid conflicts between public duties and private interests. Additionally, Broward Health is subject to Florida statutory requirements relating to public records and the conduct of its affairs in the "sunshine."

Therefore, workforce members are required to abide by the following guidelines:

- **No Broward Health workforce member shall solicit or accept anything of value—including a gift, loan, and reward, promise of future employment, favor, or service—that is based on any understanding that the vote, official action or judgment of the workforce member would be influenced by such gift.**
- **No Broward Health workforce member acting as purchasing agent or acting in his or her official capacity shall, directly or indirectly, purchase, rent, or lease any realty, goods, or services for Broward Health from a business entity in which the workforce member, his or her spouse, or child is an officer, partner, director, or proprietor, or in which the workforce member, his or her spouse, or child (or any combination of them) has a material interest. Nor shall a public workforce member, acting in a private capacity, rent, lease, or sell any realty, goods or services to his or her own agency.**
- **No Broward Health workforce member or his or her spouse or minor child shall accept any compensation, payment, or thing of value which, with the exercise of reasonable care, is known or should be known to influence the official action of such workforce member.**
- **No Broward Health workforce member shall corruptly use or attempt to use his or her official position or any property or resource within his or her trust, or perform his or her official duties, to obtain a special privilege, benefit, or exemption for himself or herself or others.**
- **No Broward Health workforce member shall disclose or use information not available to the general public and gained by reason of his or her public position for his or her personal gain or benefit or the gain or benefit of others.**



OUR COMMITMENT TO TRANSPARENCY

Business and Financial Information

Cost Reports

Broward Health is required by federal and state laws and regulations to submit certain reports on our operating costs and statistics. We will comply with all laws and regulations relating to all cost reports, including the methodologies to claim reimbursement for the cost of services provided to Federal healthcare program beneficiaries. All issues related to the preparation, submission, and settlement of cost reports must be performed or coordinated with Broward Health's Finance Department.

Coding and Billing for Services

Broward Health has implemented policies and systems to facilitate accurate billing in our programs and facilities that bill Federal healthcare programs, commercial insurance payers, and patients. These policies conform to pertinent federal and state laws and regulations. All Broward Health workforce members are prohibited from knowingly presenting, or causing to be presented, claims for payment or approval which are false, fictitious, or fraudulent. To support accurate billing, all medical records must be accurate, timely, and support medical necessity. Claims must only reflect the actual and medically necessary services ordered, documented, and performed. Coding of diagnoses and procedures must be in accordance with all applicable coding guidelines.

Documentation and Record Keeping

Broward Health produces a large number of records and documents each and every day. All documentation should be accurate and factual. Examples include medical records, financial records, electronic mails, presentations, X-rays, and lab results. The following rules apply to all types of documentation:

REMEMBER

- **We do not falsify facts or make false records.**
- **We do not sign someone else's name to any document.**
- **We do not document as someone else.**
- **We only create records that are necessary and required.**
- **We provide records and information to people who have a legal "need to know".**
- **We always preserve patient security, confidentiality and respect patient privacy.**

All workforce members must follow Broward Health's policy on retention of records. Each of us is responsible for the integrity and accuracy of documents and records. Records must be available to support the work we do and the actions we take. Records must never be destroyed in an effort to deny governmental authorities those records which are relevant to a government investigation.

Broward Health has established policies and procedures regarding the storage and destruction of records. All records are kept for the legally required timeframe. Once that timeframe ends, it is important to destroy the records in a timely and appropriate manner.

Financial Reporting

All financial information must reflect actual transactions and conform to Generally Accepted Accounting Principles. All funds or assets must be properly recorded in the books and records of Broward Health. Broward Health maintains a system of internal controls to provide reasonable assurances that all transactions are executed in accordance with senior management's authorization and are recorded in a proper manner so as to maintain accountability of the organization's assets.

Government Reporting

All required filings and reports to federal, state, and local government authorities must be made accurately and in a timely manner. False statements contained in a government filing or report could subject Broward Health, and the individual(s) responsible for filing or reporting, to civil or criminal penalties. Workforce members who provide information for a report or filing to be signed by a more senior manager are responsible for ensuring the accuracy of the information.

They are also responsible for affirmatively disclosing any problems or concerns with the process for or content of the report before it is submitted. Documentation and work papers used to prepare or support information contained in a government report or filing must be retained in accordance with Broward Health's record retention policies.

Conflict of Interest

All workforce members have a duty to protect the interests of Broward Health when entering a transaction or arrangement that may potentially benefit the private interest of a workforce member. Broward Health recognizes the right of workforce members to engage in activities outside of their Broward Health employment. However, these activities become a concern to Broward Health if they conflict with the workforce member's duties and responsibilities at Broward Health. Workforce members must follow a policy of full disclosure to assess potential conflicts of interest and prevent them from arising.

A conflict of interest may occur if outside activities or personal interests influence or appear to influence the workforce member's ability to make objective decisions in the course of his or her job responsibilities. A conflict of interest may also exist if the demands of any outside activities hinder or distract a workforce member from his or her job performance or cause the use of Broward Health resources for non-Broward Health purposes. Any questions a workforce member has as to whether an outside activity might be or appear to be a conflict of interest should be directed to his or her supervisor, Human Resources, or the Chief Ethics Officer.

Broward Health neither encourages nor discourages employment

of relatives. The basic criteria for appointment and promotion of all workforce members shall be appropriate qualifications and performance. However, no workforce member may participate in, directly or indirectly, decisions involving a direct benefit, such as initial hire or rehire, promotion, salary, performance appraisals, work assignments, or other working conditions for those related by blood or marriage, membership in the same household (including domestic partners), or persons with whom the workforce member has a relationship that could reasonably be perceived as creating a conflict that serves to undermine the integrity of leadership.

Broward Health will not allow workforce members to engage in secondary employment where a conflict of interest exists. Annually, and upon hire, all workforce members must complete a Conflict of Interest Disclosure Form. If during the year a conflict or potential conflict of interest occurs, the workforce member will discuss it with his or her supervisor and complete and submit an updated Conflict of Interest Form. The Chief of Internal Audit will review all Conflict of Interest Statements on at least an annual basis.

EXAMPLES OF CONFLICT OF INTEREST

- **Outside employment or activities that use the equipment, personnel or other resources of Broward Health.**
- **Acceptance of gifts, payment, or services from those seeking to do business with Broward Health.**
- **Outside activities (consulting, employment, management, or other contractual relationships) with a person or entity, or financial interests in an entity, that does business with Broward Health, particularly when the workforce member may influence a Broward Health decision involving that entity.**
- **A workforce member's spouse or other immediate family member who is engaged in a business similar in nature to Broward Health or under contract with the Broward Health, or is employed by an organization under contract with Broward Health.**

Government Investigations and Search Warrants

Broward Health will cooperate fully with government investigations and other requests for information. If a government investigator contacts you regarding your work, affiliation with, and/or knowledge of Broward Health, do not feel pressured to talk to the investigator without first contacting the General Counsel's Office. As a workforce member, you have the right to:

- **Speak with the investigator.**
- **Request that the interview take place at a time and place that is convenient to you.**
- **Have legal counsel present.**
- **Terminate the interview at any time.**
- **Refuse to answer any questions.**

If you do speak with the investigator, Broward Health expects you to be truthful and to avoid speculation in your responses. It is important to remember that interviews with government investigators have a substantial legal effect and may impact your legal rights and those of Broward Health. You should always be polite and obtain the following information:

- **The business cards of all investigators.**
- **The reason for the visit.**
- **Whether there is a subpoena or warrant.**

If you are presented with a subpoena, search warrant, or court order, it is expected that you will immediately notify your supervisor and the General Counsel's Office. Broward Health workforce members are to respond with complete and accurate information. Workforce members must never conceal, destroy, or alter any documents.



OUR COMMITMENT TO OUR TEAM

Workplace Conduct and Employment Practices

Broward Health's goal is to create and maintain a positive, engaged, and collaborative partnership and an inclusive work environment. Consistent with these goals, Broward Health seeks to hire, train, mentor, support, and retain a qualified and competent workforce dedicated to the strategic goals and mission of Broward Health, while fostering an environment of mutual respect and accountability to comply with Broward Health's policies and regulatory and accrediting standards.

Broward Health encourages workforce members to report in good faith any illegal and/or non-compliant behavior or activity to a supervisor, the Regional Human Resources Department, and/or the Corporate Compliance Department through the anonymous hotline.

Conduct Standards and Expectations

In order to support a positive and productive work environment, all workforce members are expected to conduct themselves in a professional and productive manner and treat all individuals with courtesy and respect at all times. Workforce members are expected to refrain from engaging in conduct that is disruptive, unprofessional, or that undermines Broward Health's commitment to patient and workforce member engagement.

Certain activities are not permitted on the Broward Health premises:

- **Solicitation.** Except as specifically authorized, workforce members are not permitted to distribute materials or to engage in any solicitation activity on Broward Health premises. A person who has a legitimate contractual agreement with Broward Health may be allowed to provide information where appropriate, for the purpose of delivery of healthcare, efficient business practices, or providing professional development in furtherance of a contractual obligation. However, such persons shall not engage in sales solicitation directed at workforce members, patients, or guests.
- Workforce members may not use electronic mail, voice mail, or facsimiles to solicit membership, sell items, or obtain support for external business or organizations. Similarly, off-duty workforce members who remain on Broward Health premises for any reason other than official business shall be subject to the rules applicable to non-employees.
- **Firearms.** As part of our commitment to providing a safe workplace environment free from violence, Broward Health prohibits the possession of firearms, weapons, explosive devices, or other dangerous materials in its facilities. The prohibition of firearms and weapons does not apply to law enforcement officers who must be armed as a requirement of their position or appointment.
- **Drugs and Alcohol.** Broward Health is a drug and alcohol free workplace and is in compliance with the Florida Drug Free Workplace Program. We are committed to providing a safe and healthy environment for our patients, visitors, and workforce members. Broward Health workforce members are prohibited from manufacturing, distributing, dispensing, possessing, or using illegal drugs or other unauthorized or mind-altering or intoxicating substances while on Broward Health property or while otherwise performing company duties away from Broward Health.

- **The proper use of prescription medication prescribed by physicians is not prohibited; however, Broward Health does prohibit the misuse of prescription medications. Use of prescription medications must not impair an employee's ability to safely and effectively perform his or her job.**

Ineligible Persons

It is the policy of Broward Health not to contract with, employ, or bill for services rendered by an individual or entity that is excluded or ineligible to participate in Federal healthcare programs; suspended or debarred from federal government contracting; or has been convicted of a criminal offense related to the provision of healthcare items or services. These individuals, companies, or groups are not eligible to do business with or be employed by Broward Health. A workforce member who becomes ineligible will be immediately removed from any involvement in providing services covered by any Federal healthcare program.

To ensure safeguards, Broward Health performs Office of the Inspector General (OIG), System for Award Management (SAM), and other applicable listing checks upon hiring or contracting and performs additional background screening as necessary.

Electronic Media

All communication systems, including but not limited to computers, electronic mail, Intranet, Internet access, telephones, and voice mail, are the property of Broward Health and are to be used for business purposes in accordance with Broward Health's electronic

communications policies and standards. Users of computer and telephonic systems should presume no expectation of privacy in anything they create, store, send, or receive on Broward Health computer and telephone systems. Broward Health reserves the right to monitor and/or access communication usage and content consistent with our policies and procedures.

Workforce members may not use internal communication channels or access to the internet at work to post, store, transmit, download, or distribute confidential information (including Protected Health Information), threatening materials, materials the workforce member knows or should know are false, or obscene materials. Workforce members may not use our internal communication channels or internet access to engage in or encourage anything that constitutes a criminal offense, gives rise to civil liability, or otherwise violates any laws or Broward Health policy. Use of communication systems in violation of Broward Health policy may result in the loss of your privileges and subject you to disciplinary action in accordance with Human Resources' policies and procedures.

You must also comply with Broward Health's information security policies, which govern the use of information systems. Only assigned user identification and passwords shall be used. Passwords must never be shared or disclosed. Workforce members shall never use tools or techniques that compromise the integrity of Broward Health information security systems.

Social Media

Workforce members must always use online communications and other forms of social media responsibly and never post patient information or photographs to any type of public site, including any website, social media page, or other application. Always maintain patient privacy—only communicate about patients through approved channels and never text or transmit patient health information on your personal device.

We also do not share confidential information about Broward Health. If you ever identify your connection to Broward Health, make it clear that you are speaking for yourself and not on behalf of Broward Health. Ensure that your social media activities reflect good judgment, and never allow time spent using social media activity to interfere with your work commitments.

Human Resource Matters

- **Matters involving Medical Staff are managed through the Medical Staff Office in collaboration with the Medical Department Chairs and/or the Chief of Staff in accordance with the policies and applicable Medical Staff Bylaws, rules, regulations, and other applicable Broward Health policies.**
- **Matters involving contractors, vendors or affiliations are managed through the administrative member responsible for the specific contractor/vendor account or affiliation.**
- **Matters involving employee partners are managed through the appropriate Regional Leadership Team in consultation with Human Resources.**

Management Obligations

Commissioners, officers, directors, managers and supervisors at Broward Health have special obligations with respect to promoting compliance and ethics. Workforce members in these leadership positions are expected to help implement a multi-part strategy to ensure that everyone understands and follows the rules.

Build and Maintain

Management can help to develop the compliance program by:

- **Personally leading program efforts through frequent meetings that require compliance reports and regular monitoring of compliance and ethics matters and programs.**
- **Leading by example, using your own behavior as a model for all workforce member partners.**
- **Encouraging workforce members to raise conduct and ethical questions and concerns to their supervisor or through other appropriate channels.**

Prevent

- **Identifying compliance and ethics risks and proposing policies and procedures to prevent such risks.**
- **Identifying workforce members whose actions involve matters covered by Broward Health policies.**
- **Providing education and training to assist workforce members in understanding the Code of Conduct, Broward Health policies and procedures, and applicable federal and state laws and regulations.**

Detect

- **Implementing and maintaining appropriate controls to monitor compliance and mechanisms that foster the effective reporting of potential compliance and ethics issues.**
- **Promoting an environment that permits workforce members to raise concerns without fear of retaliation.**
- **Participating in compliance and ethics reviews that are conducted by the Corporate Compliance Department to assess the effectiveness of compliance and ethics measures and identify methods of improving them.**

Respond

- **Pursuing prompt corrective action to address any weakness in compliance and ethics measures.**
- **Applying disciplinary action when necessary.**
- **Consulting with Broward Health's Chief Compliance and Privacy Officer and/or Chief Ethics Officer so that compliance and ethics issues are promptly addressed.**



OUR COMMITMENT TO CREATIVITY

Our commitment to fostering innovation and creative thinking means that we support the latest in cutting-edge medical technology and scientific development, consistent with applicable laws and regulations. We know that delivering the most advanced evidence-based medicine to our patients requires considerable research, and we support the efforts of our workforce members to investigate, study, and explore novel opportunities in patient care and create new bases of knowledge. We are fully supportive of studies and other research that help to bring advanced treatments and the latest technologies to our community. We are equally committed to compliant and ethical conduct in the delivery of care to our patients.

Our commitment to creativity also extends to our approach to management. We apply evidence-based management techniques to solve problems and maximize the effectiveness of the care we provide. We use the Six Sigma methods to develop focused, data-driven processes. Our management is committed to techniques that optimize the efforts of each workforce member and implement efficient practices throughout our organization. We take a methodical, deliberate approach to providing care and managing our operations in order to streamline patient care and make the most of our resources in a high-quality environment.

Research

Broward Health supports the latest in cutting-edge research in order to provide the best possible care for our patients. However, we are equally committed to ensuring that all research is conducted in a way that maximizes the benefits of innovation while minimizing risk. All

research efforts must comply with applicable federal and state laws and regulations, including those related to patient privacy, confidentiality, and consent. Further, research efforts at Broward Health must conform to related guidance and ethics principles.

Intellectual Property Rights

We support our workforce members in helping to develop the latest information and technologies in healthcare. However, it is important to remember that such works—including works of authorship, invention, or creation—are the property of Broward Health when they are created by a workforce member during the scope of his or her employment with Broward Health. This includes any patent, trademark, copyright, trade secret, or other intellectual property right.

In determining whether something is created during the scope of employment, we will consider the nature of the workforce member's work, whether it is related to our business, and whether the work is a result of directions the workforce member received as part of his or her work. We will also consider whether the workforce member was being paid by Broward Health when he or she created the work, and whether the work was created with use of Broward Health's intellectual property or resources.

If any such work created during the scope of employment is eligible for copyright, it will be considered "Work for Hire" under the United States Copyright Act and Broward Health will be identified as the author and owner of such work.

OUR COMMITMENT TO COMPASSION

Our role as one of the largest safety net hospitals in the country means that we serve a critical role in our community as a place where patients know they can always come to receive medical care. Above that, we always treat our patients and their families with compassion, and we recognize that the service we provide to our patients is not only providing treatment, but providing care that shows consideration for each individual.

At Broward Health, we know that taking care of our patients is a privilege. We care for our patients on several levels:

- ***Physically.* We meet our patients' physical needs by providing quality medical treatment and ensuring that they are as comfortable as they can be.**
- ***Intellectually.* We communicate with our patients to make sure that they understand the treatment they are receiving, why they are receiving it, and what to expect next. In doing this, we maintain an ongoing dialogue with our patients, and make sure they have an opportunity to ask questions.**
- ***Emotionally.* We always communicate with our patients in a warm, sincere manner. We are sensitive to what our patients may be experiencing and make sure they know that they can trust us.**
- ***Spiritually.* We provide a number of resources and faith-based access points to patients of all religious and spiritual backgrounds.**

Patient Resources

In addition to the treatment we give our patients, we provide a number of resources to help with issues that are not medical in nature. We have case managers and social workers on hand to help patients navigate complex situations. All workforce members should be familiar with the types of resources that are available to patients and their families and help direct them to these resources when appropriate. For instance, we provide access points to victims of domestic violence.

Sharing Our Concerns

Our care for our patients and our community means that we alert the proper authorities when necessary. As mandatory reporters, we report through the appropriate channels (such as in suspected cases of abuse). We also participate in pandemic monitoring and cooperate with local, state, and federal authorities to ensure that relevant information is shared appropriately and timely.

Relationships with Patients and Patients' Families or Representatives

Although we care about our patients as if they were our own family, our respect for our patients and their families and representatives requires us to maintain a professional relationship with them at all times. This means that certain activities are prohibited and may result in disciplinary action, up to and including termination of employment:

- **Socializing or engaging in sexual activity with current or former patients, or any member of their family who is or was participating in any family-oriented therapy or treatment.**
- **Physical abuse or using abusive or provocative language with a patient.**
- **Using any type of restraint other than those prescribed and approved by the physician within the specified guidelines**
- **Failing to maintain the confidentiality of any patient information.**
- **Accepting gifts from, or giving gifts to, a patient or any member of the patient's family.**
- **Providing unauthorized or un-prescribed drugs, alcohol, or related paraphernalia to a patient.**



Our Commitment to Compliance and Integrity

OUR COMMITMENT TO OUR COMPLIANCE AND ETHICS PROGRAM

Corporate Compliance and Ethics Program

Our Corporate Compliance and Ethics Program is intended to demonstrate Broward Health's commitment to the highest standards of ethics and integrity and to achieving one hundred percent compliance among all workforce members within our health system. The Corporate Compliance and Ethics Program is modeled after the United States Federal Sentencing Guidelines Seven Elements of an Effective Compliance Program as well as the Office of Inspector General's Compliance Program Guidance for Hospitals, Home Health/Hospice and Physician Practices and includes the following elements:

- **Written Standards/Policies and Procedures.**
- **Compliance Officer and Committee.**
- **Developing Effective Lines of Communication.**
- **Training and Education.**
- **Effective System for Routine Monitoring and Auditing and Monitoring of Compliance Risks.**
- **Responding Promptly to Detected Offenses, Developing Corrective Action Plans and Reporting to the Government.**
- **Enforcing Standards Through Well Publicized Disciplinary Guidelines.**

Overall accountability for our Corporate Compliance and Ethics Program rests with the North Broward Hospital District's Board of Commissioners. The Chief Compliance and Privacy Officer serves as the focal point for compliance activities within Broward Health, and the Chief Ethics Officer serves as the focal point for ethics issues.

Ethical Action

Our Code of Conduct and other policies and procedures help guide us through many complex situations. Supporting all these policies, however, is our commitment to act ethically in everything we do. That means that we use our mission and our values to define who we are. We accept our responsibility to do the right thing, and we speak up when we see a problem.

Reporting Compliance and Ethics Concerns

All workforce members are expected to report any problems they see or suspect. This means that when you hear about a problem, including suspected or actual incidents of fraud, waste or abuse, or any other type of violation of this Code, you should report it. Issues can be reported to your supervisor, to Human Resources, to the Chief Compliance and Privacy Officer, to the Chief Ethics Officer, or through the anonymous hotline.

It is important to remember that you must fully cooperate with any internal investigation and only disclose information with those who have a need to know. Disclosing information about confidential investigations to those who do not have a need to know can result in disciplinary action up to and including termination.

Non-Retaliation

Broward Health protects workforce members from retaliation when they report allegations in good faith that a violation or prohibited act has occurred or is occurring. Any workforce member who believes that he or she is being retaliated against for following the Code of Conduct and/or reporting a suspected violation of the Code of Conduct should notify the Chief Compliance and Privacy Officer, the Chief Ethics Officer, and/or Human Resources.

Corrective Action

When an internal investigation finds a violation, the General Counsel's Office will initiate appropriate corrective action. Possible corrective actions include, but are not limited to, refunds of any overpayment received, workforce member disciplinary action up to and including termination and reporting to the appropriate federal or state authorities.

Disciplinary Action

Failure to comply with the Code of Conduct, Broward Health policies and procedures, or any applicable federal or state laws and/or regulations may result in reporting to applicable agencies and/or licensing boards and corrective action up to and including termination from employment. Further action may involve criminal and/or civil sanctions in appropriate cases. Failure to abide by the Code of Conduct or the applicable laws and/or regulations may result in the imposition of penalties on Broward Health, up to and including exclusion from contracting with federal and state agencies. Similar corrective actions may be applied in those instances in which an individual and/or Broward Health fail to report suspected or identified noncompliance or ethical violations.

Audit and Monitoring

Broward Health is committed to the diligent monitoring of compliance with its policies and applicable law. Much of this monitoring effort will be conducted through a combination of scheduled and unannounced compliance audits of issues that may involve actual or potential violations.

COMPLIANCE HOTLINE (DISCLOSURE PROGRAM)

1.888.511.1370

The compliance hotline is independent and anonymous. The hotline is managed by a third party. All callers have the option of remaining anonymous. The hotline responders do not have caller identification and are unable to trace calls. When a call is made, the caller is encouraged to provide enough details to investigate the caller's concerns, including the business unit and department. A caller's anonymity will be protected to the full extent allowed by law.

All reports should be made in good faith. There will be no retaliation for expressing concerns or passing along information about situations that seem questionable to you as long as they are made in good faith.

CORPORATE COMPLIANCE AND ETHICS SUPPORT

Our Corporate Compliance and Ethics Program promotes open identification, discussion, reporting, and resolution of compliance and ethics issues without fear of retaliation. The key components of the compliance and ethics programs include this Code and our policies, along with training, auditing, monitoring, and addressing problems that may arise. We promote open communication, including with federal and state governments.

Issues can be reported in several ways:

Donna Lewis, RN, MBA,CHC

**Chief Compliance and Privacy Officer
Vice President Compliance/Privacy**

**1800 NW 49th Street
Fort Lauderdale, FL 33309**

Phone: 954.473.7500

Email: dllewis@browardhealth.org

Carlos A. Perez-Irizarry, Esq.

Chief Ethics Officer and Director of Corporate Security

**1800 NW 49th Street
Fort Lauderdale, FL 33309**

Phone: 954.473.7487

Email: cperezirizarry@browardhealth.org

Additional Resources

Anonymous Hotline **1.888.511.1370**

**Human Resources Workforce Diversity,
Inclusion, and Advocacy Department** **954.355.4945**

Employee Relations Department **954.473.7045**

Regional Human Resources Departments:

BHMC **954.355.5048**

BHN **954.786.6900**

BHIP **954.776.8680**

BHCS **954.344.3010**

**BH Corporate/ Physician Practices
CHS/IS/CDTC** **954.355.5013**

HIPAA Privacy / Security **privacy@browardhealth.org**

Internal Audit **954.355.5005**

Legal Department **954.473.7025**

CODE OF CONDUCT CERTIFICATION

This certifies that as of the date indicated below, I have completed Broward Health's Code of Conduct Module. I further agree to and acknowledge the following:

	I have received, read and understand Broward Health's Code of Conduct.
	I will comply with Broward Health's Code of Conduct, Broward Health's Corporate Compliance and Ethics Program and Broward Health policies and procedures.
	I will promptly report any suspected violations of Broward Health's Code of Conduct, Broward Health's Corporate Compliance and Ethics Program and/or Broward Health policies and procedures.
	I recognize that non-compliance with Broward Health's Code of Conduct, Broward Health's Corporate Compliance and Ethics Program and/or Broward Health policies and procedures may result in a number of consequences, including but not limited to termination.

Signature:

Print Name:

Employee Number:

Title:

Date:

Region/Facility:





Corporate Compliance Department
1800 NW 49th Street, Fort Lauderdale, FL 33309
Phone: 954.473.7500