

Southcoast Health

Code of Conduct

Standard of Excellence



Being our best
for our patients, our community,
and each other.





Commitment to Ethics and Integrity

- 2 Leadership Message
- 4 Our Model of More
- 5 Service Behaviors
- 6 Code of Conduct Overview



Our Responsibilities and Obligations

- 8 Our Responsibilities
- 8 Additional Responsibilities of Leaders
- 9 Making Ethical Decisions
- 10 Asking Questions, Raising Concerns
- 10 Confidentiality and Anonymity
- 11 Zero Tolerance for Retaliation



Our Commitment to Our Patients

- 12 Respect and Dignity
- 12 Quality Health Care Services and Patient Safety
- 13 Patient Rights
- 13 Availability of Emergency Medical Treatment



Workforce Integrity

- 14 Workplace Civility
- 14 Safe, Healthy and Secure Workplace
- 15 Diversity, Equity and Inclusion
- 15 Discrimination and Harassment
- 16 Alcohol-, Drug-, and Smoke-Free Work Environment
- 16 Social Media and Networking, and Contact with Media
- 17 Gifts or Gratuities



Business Integrity

- 18 Charitable Duties
- 18 Use and Protection of Charitable Resources
- 18 Financial Integrity
- 19 Accurate Billing and Coding
- 20 Licensure and Professional Certifications
- 20 Conflicts of Interest
- 21 Vendor Interactions
- 21 Confidential/ Proprietary Information and Trade Secrets
- 22 Business Records
- 23 Marketing
- 23 Fundraising



Regulatory Integrity

- 24 Fraud, Waste, and Abuse
- 26 Interaction with Regulators, Inspectors and Accrediting Agencies
- 26 Political Activities
- 27 Excluded Individuals and Entities
- 28 Patient Confidentiality and Medical Records



If You See Something, Say Something

“Maintaining the highest level of ethics requires not only complying with the Code of Conduct ourselves but holding our co-workers and business associates accountable to it as well.”

At Southcoast Health, doing what’s right for each other and our patients means acting ethically and holding ourselves, and each other, accountable. We are committed to ensuring a safe, secure, and healthy workplace and a culture where people are respected and valued as equal team members, because it is only when we take care of each other that we can best care for our patients. Southcoast Health’s Code of Conduct helps achieve this.

Working with integrity, compliance and transparency is critical in healthcare delivery settings. When patients seek care at a Southcoast Health location, they do so with full faith and trust that our providers are making decisions based only on what’s

best for them, and that our staff respect their privacy and the confidentiality of their personal information.

These values are also extremely important to me personally. My goal is that every Southcoast Health employee, at every level and in every role, embodies these values and holds themselves and their co-workers accountable to them.

Southcoast Health’s Code of Conduct provides an ethical framework to guide our actions so that we continue to earn the trust and goodwill of patients and of the community that supports us, and we continue to fulfill our obligation to deliver high quality health care, close to home.

The Code helps us make the right decision at any point in time. It also demonstrates to new team members, visiting providers, suppliers, and vendors that we are committed to fulfilling our ethical, professional, and legal responsibilities.

It takes active involvement and courage to maintain the level of integrity that the Code requires. If you see something at Southcoast Health that doesn’t look or feel right — even if you are not sure — you should bring it to someone’s attention. This Code of Conduct explains the ways you can do that. Anyone who reports a concern or wrongdoing should feel assured that they have the full support and backing of Southcoast Health.

Holding ourselves to the highest standards of integrity and compliance is the right thing to do for our colleagues, patients, and their loved ones. Thank you for living the values of our Code of Conduct every day.

With gratitude,

David O. McCready
President & CEO, Southcoast Health



At Southcoast Health, we deliver More every day. We pursue our Mission with passion while we fulfill our Promise to our patients, community and colleagues. We do all of this as a team, with a shared Vision guided by our core Values, because we genuinely care about you, your health, your wellness and your quality of life.

Our Promise to Our Patients & Our Community

Exceptional Care from People Who Care.

Our Mission

Provide clinical excellence and a uniquely caring experience to every life we touch.

Our Vision

Be bold. Be the best. Be the leader in delivering exceptional, accessible, and convenient care and service.

Our Promise to Our Employees & Each Other

The strength of Southcoast Health comes from our people. As a united team of caregivers, we fulfill our promise to “deliver exceptional care from people who care.”

We are welcoming, inclusive and treat all individuals with respect, dignity, and integrity.

We passionately nurture the well-being of our community, and we are dedicated to professional and personal development in pursuit of excellence.

At Southcoast Health we are all caregivers. We are **More than medicine.**

Our Values

- I am proud to be Southcoast!
- I establish trusting partnerships with patients, their families, and my colleagues to create meaningful, long-lasting relationships.
- I am empowered to confidently make decisions and create an exceptional experience for everyone.

- I proactively and genuinely Smile, Really listen, Stay a step ahead, Walk in their shoes and Show TLC with patients, their families and my colleagues.

- I see challenges as opportunities, and take ownership of identifying and executing solutions.

- I am an important, contributing member of a team that is caring, respectful, dedicated and inclusive.

- I maintain a growth mindset and continuously embrace opportunities to learn and develop.

- I add value and make a positive difference each day.

I choose to be **More than medicine!**

Service Behaviors

Smile – You have the power to create an exceptional experience. Make patients and families feel welcome with a friendly smile and a warm greeting. Follow the principles of 10/5/1: When 10 feet away, make eye contact. When 5 feet away, smile and say “Hello.” When 1 step away, ask, “Can I help you?”

Really Listen – Everyone wants to feel heard and know that their opinions matter. Taking time to really listen makes people feel valued and appreciated. Give patients and families your full attention and make eye contact. Repeat back what you’ve heard to ensure you’ve understood them correctly.

Stay a step ahead – Being proactive is the key to excellent service. Patients and families depend on you for care, information and answers. Anticipate their needs and concerns. Proactively explain treatments and provide regular updates, so they feel informed and confident in their care.

Walk in their shoes – Compassion is at the heart of what we do. Try to see things from your patients’ perspective. Think about fears or concerns they might have. Show you understand by listening and being supportive. Ask, “Is there anything more I can do to help you today?”

Show TLC – People want to feel comforted and cared for. A visit to the doctor or hospital can be an overwhelming experience. Make every effort to make individuals feel comfortable. Little things like addressing patients by name, using a calming voice, or holding a patient’s hand when appropriate make patients feel cared for.



Code of Conduct Overview

What Is the Code of Conduct?

Southcoast Health's Code of Conduct reflects our expectations for Southcoast Health employees and others and Southcoast Health's business partners and service providers. This Code of Conduct is our commitment to acting ethically, with fairness, and integrity. It explains how we should act every day, what to do if we have questions or concerns, and the consequences of wrongdoing.

The Code of Conduct is grounded in Southcoast's policies and procedures. Though consistent with these policies and procedures, it is not meant to take the place of them. It is meant to be a helpful

guide to ethical behavior rather than a detailed, comprehensive list of rules and regulations. Employees and others should consult the appropriate Southcoast policy when detailed guidance and understanding of requirements are needed.

Additionally, the Code of Conduct covers a broad range of issues and behavior. We encourage everyone to review the Table of Contents and read the document to understand what is in the Code of Conduct and gain a solid grasp of the general expectations for ethical conduct. We also encourage everyone to use the document as a reference when faced with an ethical decision or question about ethical behavior. Everyone must report Code of Conduct violations. Southcoast

Health has a procedure that lets anyone safely report unethical or illegal actions without retaliation. Any retaliation against someone for reporting wrongdoing will not be tolerated and will be immediately addressed.

Our standards for conduct promote a positive workplace for employees. The standards also support a culture that enhances patient care, quality and safety.

Why is it important to have a Code of Conduct?

The Code of Conduct unites us. By guiding us to do what's right and fair, the Code of Conduct helps us better serve our patients, our community and each other. It helps create a safe, secure and healthy workplace, one where we are all respected and valued, and where we respect the dignity of one another.

To whom does the Code of Conduct apply?

The Code of Conduct applies to Board members, executives, employees and representatives of Southcoast Health, including medical/professional staff, contract staff, vendors, volunteers, and students. It applies to everyone at all levels at Southcoast Health. We ask our community partners also to know and honor this Code of Conduct. To create a positive workplace and patient care environment, we hold each other accountable for knowing and following the Code of Conduct. For reference, the Code of Conduct is posted on our intranet.

How will the Code of Conduct be monitored?

The Office of the President of Southcoast Health has overall responsibility for implementing the Code of Conduct. If you fail to comply with the Code of Conduct you will be subject to disciplinary action up to and including termination of employment. You may be disciplined if you manage others and ignore misconduct or fail to take action to correct it.

Each year, Southcoast Health asks you to confirm that you understand and will follow the Code of Conduct.

Being the best we can be

What should I do if someone is not following the Code of Conduct, a regulation, law, policy or procedure?

Report your concern immediately. As an employee, you must report any possible violation. Speak to your supervisor or another manager. You may also call the Compliance Hotline at 508-973-5040. You are allowed to make report a concern anonymously.

When should I use a Code Zero?

Staff are encouraged to quietly interrupt and address a co-worker's disruptive behavior or inappropriate conduct by using the phrase 'Code Zero'.



Doing what is right is not always easy. This model will help you make better ethical decisions.



Our Responsibilities

At Southcoast Health, we are all responsible for keeping high standards in our work and professional relationships.

We ask that you:

- Read and follow the Code of Conduct.
- Use good judgment and seek help when you do not know what to do.
- Always act ethically, honestly and truthfully.
- Help support respect, inclusion and professionalism.
- Report conduct not in keeping with our values.
- Use Code Zero if you witness inappropriate comments or behavior by an employee.
- Cooperate with investigations of reported issues.

- Participate in training programs to learn more about the Code of Conduct and how it applies to your work.

If an issue is unclear, ask for help from your supervisor. If that does not clear up the matter, get assistance until the issue is resolved, including calling the Compliance Hotline at 508-973-5040 or emailing Corporate Compliance at compliancehotline@Southcoast.org.

Additional Responsibilities of Leaders

Southcoast Health leadership are important to inspiring others to uphold Southcoast Health's values. When we talk of leadership, we are referring specifically to anyone who has responsibility for supervising the work of others, such as Vice Presidents, Executive Directors, Directors, Managers, Supervisors, Team Leaders, etc.

For this important reason, we ask those of you in leadership positions to:

- Serve as role models for supporting our Promise, Service Behaviors and Values. Leading by example and making clear that acting with integrity is as important as business results.
- Communicate high standards for ethical behavior.
- Promote trust, open communication, respect and dignity.

- Support a workplace and patient care environment that is inclusive and free of discrimination and harassment.
- Encourage those you lead to ask questions and raise issues and concerns.
- Make sure those you lead complete required trainings.
- Abide by Southcoast Health's non-retaliation policies.
- Allow employees time for attending compliance, regulatory and business ethics training.
- Consider compliance efforts and results when evaluating and rewarding employees.
- Help employees understand their responsibilities.
- Remind your team members about Code Zero to ensure appropriate behavior is maintained.

- Address poor conduct with proper action.
- Make use of helpful resources offered by Human Resources, Administration and Corporate Compliance.

Making Ethical Decisions

The Code of Conduct reflects Southcoast Health's standards and responsibilities. In following these standards, ask yourself these questions to help make the right decision:

- Are my actions legal and ethical?
- Are my actions allowed by our Code and by our policies and procedures?
- Are my actions in keeping with our values?
- Am I acting in the best interests of Southcoast Health?

- Am I acting in the best interests of patients?
- Could someone's life, health, safety or reputation be harmed by my actions?
- How does my decision affect others?
- Am I being fair and honest?
- Can I defend my actions?
- Would I be embarrassed to tell my family, friends or coworkers?
- How would it look if my decision or actions were reported publicly such as on social media or in the news?



Asking Questions, Raising Concerns

What should you do if you see something wrong or unethical, or if you see anything that goes against Southcoast Health’s mission and principles? Our duty is to report it. Take steps to safely stop the harmful actions if doing so can prevent more harm and can be done without risk to your safety. If taking steps to safely stop the harmful actions would not prevent more harm or could not be done without risk to your safety, seek help from someone who is in a position to stop the harmful actions, such as security or if necessary law enforcement.

By speaking up, you are looking out for the good of everyone and Southcoast Health’s long-term well-being. Southcoast Health requires that employees cooperate with investigations. Not reporting a known issue, obstructing a report or inquiry or refusing to cooperate with an investigation could lead to corrective action.

We all have to work together to keep Southcoast Health’s integrity. We have many resources available if you need help. You can bring up ethical concerns or questions with:

- Your supervisor
- Your department manager
- A Human Resources representative (or if unsure who in Human Resources to contact, you may confidentially email employeerelations@southcoast.org.)
- The Southcoast Health Chief Compliance Officer

You can also call the Compliance Hotline at 508-973-5040 or email ComplianceHotline@Southcoast.org. The Hotline is confidential and available 24 hours a day, 7 days a week.

Confidentiality and Anonymity

Southcoast Health always handles reports and investigations as confidentially as possible. You can make a report anonymously through the Compliance Hotline. All information is protected to the extent allowed by law.

Zero Tolerance for Retaliation

Creating a positive, ethical culture requires trust. Protecting those who speak up and report concerns is at the heart of maintaining this trust. This is why Southcoast Health does not tolerate or allow retaliation against anyone who reports a concern. This practice is referred to as “Zero Tolerance.” Anyone who makes a good-faith report is protected from retaliation or retribution. Every employee should know and understand that retaliation in any form will result in corrective action.

Being the best we can be

If I call the Compliance Hotline to report a concern, will I find out what happened with the investigation?



All calls to the Compliance Hotline are taken seriously and investigated. When you ask a question, seek guidance or raise a concern, you will receive a response if you have provided your name and a means to contact you.



Our Commitment to Our Patients



More than medicine

We provide the highest quality of care to all regardless of age, gender, race, religion, national origin, sexual orientation, disability or any other legally protected characteristic. Then. Now. Always.

Respect and Dignity

At Southcoast Health, every patient should receive professional and compassionate care. We follow laws, regulations, accreditation standards and our policies. For instance:

- We help patients know and exercise their rights, such as the right to privacy; to be free from discrimination; to make informed health care decisions and advance directives; and file grievances.
- We inform patients and, when permission is given, their families and others, about care, treatment and services.

- We help patients understand the financial help available to them.
- We honor each patient's right to have visitors. If there are limits on visitors, we give patients clear reasons for those limits.
- We treat patients with dignity and provide a uniquely caring experience to every life we touch.

We are proud to care for patients and honored to be Southcoast Health ambassadors while providing care to those living within the communities we serve.

Quality Health Care Services and Patient Safety

Southcoast Health has a complete program to promote quality patient care. This includes:

- Providing safe, effective, patient-centered, timely, efficient and equitable care.
- Monitoring patient outcomes, quality and patient satisfaction;
- Carrying out evidence-based programs for patient safety and quality.
- Comparing Southcoast Health's service quality to national standards.
- Finding ways to improve quality of care.
- Supporting ongoing patient safety program.
- Including patients and families in developing care plans.

Patient Rights

From admission through discharge, patients have health care rights and should know Southcoast Health's expectations for patients receiving care. We follow all laws and give every patient (or representative) a copy of these Patient Rights when admitted to a hospital or an outpatient program.

To uphold Patient Rights, we:

- Offer patients equitable, respectful and non-discriminatory treatment and services.
- Explain to patients their care plan.
- Allow patients to make informed decisions about their care.
- Give patients and their caregivers free translator or interpreter services when needed.

Availability of Emergency Medical Treatment

- We provide emergency medical treatment to patients who come to the hospital for emergency care, even if they do not have health insurance or cannot pay according to federal and state law.
- In an emergency or when patients are in labor, we do not delay medical screenings or stabilizing treatments to obtain financial and demographic information.

- We do not make any decisions regarding emergency medical treatment based simply on payment or any other discriminatory factor.
- We follow state and federal requirements, and Southcoast Health Emergency Medical Treatment and Labor Act (EMTALA) policies when transferring patients with emergency medical conditions to other facilities.



Workplace Civility

Southcoast Health is committed to having a positive, professional, ethical and respectful workplace and patient care environment. We expect that you will follow our Code of Conduct and our policies as they help create a civil, respectful and safe workplace and patient care environment.

- We are all responsible for our actions. We decide how to conduct ourselves every day as we go about our work.
- We are committed to equity and inclusion.
- We do not accept abusive language and disruptive behavior.
- We are committed to respecting one another as colleagues, to respecting our patients and anyone who seeks our care and service, as persons worthy of dignity.

Our behavior reflects our stated values, which includes being supportive and working as a caring, compassionate and dedicated team.

- We all work together to carry out our promise: exceptional care from people who care, close to home.

Safe, Healthy and Secure Workplace

Safety is important. We follow laws and regulations that protect all of us. Not only is it the right thing to do, but it helps us better care for patients. It is how we establish trusting partnerships with patients, families, colleagues and our community.

To keep everyone safe, we expect that you:

- Know and follow all policies and procedures.
- Never take needless risks or ask anyone else to do so.
- Know what to do in case of injury or other workplace emergency and cooperate during emergency drills.
- Report immediately any unsafe conditions or behaviors.
- Call the police when there is imminent danger.

As a healthcare provider, Southcoast Health also takes special precautions with hazardous materials, infectious diseases and biomedical material. You should always follow policies regarding personal hygiene, sanitation, sterilization and disposal of materials.

Violence and threats of violence are unacceptable.

- Never bring a weapon, firearm or explosive into a facility.
- Never strike another person.
- Never threaten another person.
- Never stalk or harass another person.

Diversity, Equity & Inclusion

At Southcoast Health, we embrace and promote a diverse and welcoming workplace for all. We recognize, respect and celebrate the rich diversity of one another and the communities we serve.

We value diversity in the workplace and strive to hire and retain a diverse workforce. We provide equal employment opportunities. Employees and job applicants are not unlawfully discriminated against for any reason. We do not discriminate in the care we provide to patients based on age, disability, race, ethnicity, religion or belief, ethnicity, marital status, gender, or sexual orientation.



Discrimination and Harassment

We support a productive, inclusive workplace and patient care environment free of discrimination and sexual or other harassment. We work to prevent, correct, and discipline discriminatory behavior or harassment.

We rely on every employee to help maintain a respectful and productive workplace. We commit ourselves to treating one another with dignity.

Employees and others may report discrimination or harassment without fear of retaliation.

We value fairness and equity in the workplace and believe it is important to our growth, achievement and success.

Being the best we can be

What is meant by sexual harassment?

Sexual harassment is defined as unwelcome sexual advances, requests for sexual favors, and other verbal or physical conduct of a sexual nature when:

- submission to such conduct is made, either explicitly or implicitly, a term or condition of an individual's employment, or
- submission to or rejection of such conduct by an individual is used as a basis for employment decisions affecting such individual, or
- such conduct has the purpose or effect of unreasonably interfering with an individual's work performance or creating an intimidating, hostile, or offensive working or patient care environment.

If you have been the subject of this type of behavior, please notify your supervisor or Human Resources. Allegations will be investigated and offenders will be appropriately disciplined.



Alcohol-, Drug- and Smoke-Free Work Environment

Southcoast Health hospitals, facilities and properties, including parking lots, sidewalks and green space, are smoke-free.

We have a safe and drug-free workplace. Always:

- Be free while at work from alcohol and illegal drugs or any substances that may hamper your job performance.
- Notify your supervisor if a medication, either prescribed or over-the-counter, may impair your judgment or job performance.
- Immediately consult your supervisor if you observe an impaired individual.
- Our Human Resources Department can arrange for confidential counseling and treatment for drug and alcohol dependence through the Employee Assistance Program.

Social Media and Networking, Contact with the Media

Social media helps people connect. It helps Southcoast Health communicate with patients and the public. However, using social media can be risky. There is always the potential to help or harm our reputation. To lessen this risk, only our Public Information Officer and Social Media Specialists may use social media on behalf of Southcoast Health.

Social media communications for Southcoast Health should be handled by those with the training. Posts should be thoughtfully prepared, checked and approved.

When using social media:

- Use social media time responsibly so that it does not interfere with work.
- Distinguish between personal posts and those approved by Southcoast Health.
- If you are specifically permitted to endorse our organization or services, identify yourself as a Southcoast employee.

Never:

- Speak on behalf of Southcoast Health if not specifically permitted to do so.
- Post photos of patients or any information about patients, even if you do not use their names.
- Respond to posts from patients or their families (whether on Southcoast Health accounts or on your personal accounts).
- Post photos of working areas that could show confidential information in the background. Revealing private information could violate HIPAA, even if not intended.
- Reveal confidential or proprietary information of Southcoast Health, our business partners or our competitors.
- Acknowledge publicly the treatment of any individual at Southcoast Health.
- Make indecent comments.
- Defame others or hurt their reputation.

Gifts or Gratuities

Southcoast Health does not allow gifts if they could be seen as an attempt to affect decisions or actions of Southcoast Health. Gifts may be accepted when their value is too small to influence the receiver. For example, clinical and administrative employees may accept small gifts such as flowers or cookies from patients or families in appreciation for care provided to patients. Similarly, token promotional gifts from suppliers, such as advertising novelties marked with the supplier's name, are generally okay.

As a Southcoast Health employee, you may not accept cash, gift cards, stock, event tickets or anything financially valuable. However, you may accept gifts on behalf of Southcoast Health by directing the gift to Philanthropy. When this happens, tell the donor that you can give the gift to Philanthropy.

Being the best we can be

What should I do if I am not sure about a gift I have received?

If you are not sure whether a gift is allowed, ask Corporate Compliance. It's always best to check before giving or receiving a gift.

A member of the media contacted me regarding information I shared via social media. What should I do?

Reporters and journalists are increasingly turning to social media as sources for their news stories. Be aware that what you share may become the subject of media coverage. Always follow Southcoast's Social Media Policy when sharing information online. If you are asked about Southcoast's position or view, do not comment and direct the reporter or journalist to Southcoast's Public Information Officer.



Charitable Duties

As a charitable organization, Southcoast Health is obligated to serve the community and contribute to the public health. Southcoast Health does this by providing access to high quality health care services and facilities, prioritizing community needs, accepting all patients who walk through its doors, and providing charity care and other discounts to make sure financial barriers do not prevent patients from receiving care and treatment.

Southcoast Health's charitable mission and its reputation rely on integrity in everyday actions and decision-making. Southcoast Health and its employees put the organization first, and act in Southcoast Health's best interests. Employees may not use Southcoast Health resources for personal gain or to improperly benefit any outside person.

Use and Protection of Charitable Resources

To fulfill its charitable mission, Southcoast Health is obligated to use its resources responsibly and wisely. Southcoast Health must ensure that resources are used properly to aid the public and not directed towards private interests. Southcoast Health does this by making sure that contracts are based on fair market value in an arms' length transaction, and that relationships with vendors and other business partners are clearly described and without improper influence or self-dealing.

Financial Integrity

At Southcoast Health, we must act with integrity in all financial matters related to Southcoast, following the laws and expectations for a charitable, community health system. We understand and respect the need to follow Southcoast Health's internal controls because they promote efficiency, ensure reliable financial reporting and follow the law. Internal controls and procedures protect Southcoast Health and our patients, vendors, payors and others. These controls help prevent fraud, lessen errors, support efficiency and comply with the law.

To maintain financial integrity, we ask that you:

- Follow all internal controls or procedures that apply to your job.
- Never bypass an internal control, even if it might seem harmless.
- Keep detailed records of all financial transactions and assets.
- Account for and protect all funds donated to Southcoast Health.
- Abide by access controls and information security safeguards to protect financial information.
- Report failure to follow controls or procedure to the Compliance and Internal Audit Department.

Accurate Billing and Coding

We ensure the integrity of our billing process and guard against false or fraudulent claims. We are reimbursed for our services by several payors, including the government, insurance companies and individuals. It is our job to follow all regulations and to provide accurate, complete and timely billing information.

We have several ways to ensure the integrity of our billing processes and guard against any false or fraudulent claims:

- **Employee Orientation and Training:** Ongoing training and evaluation ensures that we uphold our standards. These measures also reinforce the high quality we expect in financial matters.
- **Billing Controls:** We have internal controls in our billing systems. If our job includes coding or billing activities, we follow all required policies. We also have software systems that include compliance and security controls.
- **Cost Reports:** Detailed analyses of charges by department are required for Medicare and Medicaid reimbursement. They include data on patient volume and provider reports that give insight into our financial health.
- **Legal and Compliance:** Southcoast Health retains legal and compliance advisors for important business decisions to help identify and address risks in advance.

Being the best we can be

The firm my organization uses for marketing and advertising offered me two courtside tickets to a professional basketball game. Can I accept the tickets?

No, you must politely decline the acceptance of personal gifts that involve social or entertainment activities. You may accept the tickets, only if you personally pay the supplier the cost of the tickets. You may also contact the Corporate Compliance Department at 508-973-5040 or by email at compliancehotline@Southcoast.org.



- **Audits:** We spot-check our routine billing and coding audits systems. They are essential to our proactive approach to compliance. Government agencies and other payors may also verify accounts with audits. We cooperate fully with audits.
- **Investigations:** We seek the truth when there is a report or suspicion of improper activity. Outside agencies and companies may also ask for our assistance with an inquiry. We cooperate fully with lawful investigations.
- **Destruction:** We will not interfere with an audit or investigation by destroying requested documentation such as email, reports, handwritten notes, etc. We provide accurate and timely information.
- **Retention:** We will retain records according to best practice and state and federal law.

Licensure and Professional Certifications

Southcoast Health relies on the training, dedication and expertise of clinical staff to provide high quality health care services. Employees are obliged to practice in keeping with law and their permitted scope of practice as allowed by their license, registration, or certification. Clinical staff must act within their scope of practice and disclose licensure and professional status to patients and the public when representing Southcoast Health.

You should always:

- Keep your licenses, registrations, and certifications current.
- Renew credentials on time and fulfill continuing educational credit requirements.
- If you work as a contractor, make sure you can show proof of current status.

Conflicts of Interest

A conflict of interest occurs when outside personal, financial, political or social interests or activities make it difficult to do work in the best interest of Southcoast Health. You should avoid situations that conflict, or appear to conflict, with the best interests of Southcoast Health. Conflicts of interest can occur in a variety of ways; The following situations are some of the types of arrangements that often produce conflicts of interest:

- Doing business with family or close friends.
- Hiring consultants, agents and other third parties you have a personal relationship with.
- Accepting entertainment or gifts from people or companies we do business with.

If you are aware of an actual or potential conflict of interest, you are obliged to report it to your supervisor or to the Corporate Compliance Department.

Vendor Interactions

Southcoast Health awards vendor contracts based only on business criteria such as quality, price and availability. Many factors affect our purchasing decisions. Awarding vendor contracts on merit is not only better for business, but it is our ethical and legal responsibility. We must avoid even the appearance of improper behavior.

You are expected to:

- Follow all laws.
- Do business professionally and ethically.
- Make vendors aware of our Code of Conduct and related policies.
- Refuse and report any gifts or money that vendors may offer us in exchange for business.

We expect vendors to:

- Be given business based on their ability to meet our needs.
- Meet high legal, ethical and professional standards.
- Make sure subcontractors understand and follow our policies and standards.
- Respect patient privacy and confidentiality.

Confidential/Proprietary Information and Trade Secrets

Southcoast Health employees have access to valuable confidential and proprietary information of Southcoast Health, and the organization's affiliates, business partners, and patients and their families. Southcoast Health also holds many protected trade secrets and similar pieces of confidential information that have value and are essential to carry out our mission and for success. Southcoast Health employees must protect confidential and proprietary information and trade secrets, including business plans, strategies, staffing, locations, schedules, partnerships, vendor negotiations, and other business matters. You should never disclose this kind of information except as needed in your job.



Being the best we can be

I just discovered an error in a financial report that we submitted to a government agency two years ago. What should I do?



Mistakes happen, but when we find them we need to address them. Even errors in older documents and reports can have an impact on payment and care decisions now. If you find (or suspect) an error or inaccuracy, let your supervisor know. Your supervisor can seek guidance from the Corporate Compliance and Legal Departments. You may also contact the Corporate Compliance Department yourself at 508-973-5884.

All employees, staff and third parties with access to Southcoast Health's confidential information must sign a confidentiality agreement. Disclosing confidential information without specific permission and in compliance with Southcoast Health policy and the law is a wrongdoing. Doing so has serious consequences.

What Is Confidential Information?

- Examples of information that is highly confidential include:
- Patient medical information
 - Patient financial records
 - Clinical information
 - Research data
 - Patient lists
 - Information obtained from employee personnel records
 - Pricing and cost information
 - Merger, acquisition, divestiture and other financial information
 - Company strategies
 - Company passwords

- Information about Board and Board committee discussions and decisions

Business Records

Southcoast Health is required to keep up-to-date and accurate business records. We are required to accurately document our business activities by following recordkeeping requirements and industry standards. Business records may be kept electronically or in hard paper copy (or both). Accurate business records are essential. It allows Southcoast Health to show compliance with laws for charitable organizations, as well as health care cost reporting laws. Records should only be changed in compliance with law. Business records must be safeguarded and retained in keeping with record retention laws and policies. Business records must be destroyed in a secure manner and in keeping with record retention requirements.

Always:

- Follow internal controls and all relevant laws and regulations.
- Maintain books, expense reports and receipts that accurately reflect financial transactions.
- Ensure documents are properly authorized when required.
- Submit records to internal and external auditors promptly and accurately when requested.

Never:

- Create false or misleading entries, records or documentation.
- Make payments or set up accounts on behalf of Southcoast Health for purposes other than for those described by supporting documents.

Marketing

At Southcoast Health, we represent ourselves with honesty and integrity in marketing and advertising. We work hard to help the public understand our commitment to patients, the community, and employees. Honest advertising and marketing help us protect and promote that image.

In our marketing and advertising materials, we:

- Support any claims with facts.
- State our services clearly to avoid confusion.
- Respect our competition by never badmouthing other healthcare providers.
- Follow all state and federal advertising laws.

As a major public institution in southeastern Massachusetts and Rhode Island, Southcoast Health has a registered logo. This is a legal trademark and must be placed on all Southcoast Health literature. This includes letterhead, memos, agendas, brochures, educational materials, publications and similar material. Southcoast Health offices should use the logo properly. All advertising or promotional material should contain the Southcoast Health logo. This material must be approved by the Brand & Strategy Division.

To make sure you are using the Hospital logo correctly, refer to Southcoast Health Logo Use Guidelines, which can found on the Southcoast Health intranet under Marketing & Communications.

Fundraising

Charitable fundraising events and solicitations sponsored by Southcoast Health or any department or division must follow federal, state and local laws and the organization's reporting, record-keeping and registration procedures. Southcoast's Philanthropy Department is responsible for overseeing all fundraising efforts. Business opportunities should not be tied to donations or improper use of Southcoast resources.



Being the best we can be

What do I do if I see a billing error?

If we see a billing error, we involve a manager, Corporate Compliance or the Compliance Hotline. We investigate and correct the error prior to seeking payment. If we have already billed, we correct the underlying problem and make the proper disclosures and refunds.



Fraud, Waste, and Abuse

Southcoast Health is obliged to find, prevent and address fraud, waste, and abuse. We promote accountability and integrity; fraud is not allowed. As a health care provider, Southcoast Health must follow strict fraud, waste, and abuse laws, including the federal False Claims Act (and state equivalents), the Anti-Kickback Statute, the Physician Self-Referral Law (Stark Law), and the federal Civil Monetary Penalties Law.

These laws forbid employees from offering, receiving or seeking kickbacks (or other items of value) related to Southcoast Health business, directly or indirectly.

These laws also forbid overutilization or medically unnecessary services. Southcoast Health puts the interests of patients and the community first. Our compliance program ensures that wrongful activities are found and corrected.

As ethical and law-abiding employees, we never:

- Accept bribes.
- Accept kickbacks.
- Let gifts influence our business decisions.
- Engage in fraud, such as:
 - Falsifying financial or medical records.
 - Ordering unnecessary tests or procedures for personal gain.
 - Stealing anything, including company supplies, patient belongings or confidential information.
 - Failing to accurately record and bill tests, medications or procedures (e.g. upcoding)

What Is a False Claim?

Examples of false claims include:

- Billing for services that were not provided.
- Billing for services not medically necessary.
- Submitting inaccurate or misleading claims about the types of services provided (e.g. upcoding).

If you have concerns about any practice or arrangement that may violate a fraud, waste or abuse law, you should bring those concerns to the Compliance Department.

More than medicine

Examples of improper activity to get referrals or business?

- **Offering free or discounted space or equipment to a physician to encourage the physician to admit patients to one of our facilities.**
- **Waiving pharmacy copays or coinsurance to give patients an incentive to get their prescriptions filled with us.**
- **Accepting a gift from a medical supplier as a “thank you” for increasing their supply orders.**

These kinds of arrangements may be okay in other business situations, but they can be illegal in healthcare. If your work involves arrangements between Southcoast and other healthcare providers and/or suppliers, you need to be familiar with Anti-kickback, Stark and Patient Freedom of Choice laws. Then. Now. Always.



Being the best we can be

Remember, we do not do business with individuals or entities that are not in good standing with the government health programs.



Interaction with Regulators, Inspectors and Accrediting Agencies

We are respectful and responsive when dealing with the government, accrediting agencies and other auditors or regulators. We also make sure that we follow applicable laws and regulations. We promote accountability and monitor compliance to find opportunities for improvement.

Because of the sensitive nature of inquiries, you should forward contacts from regulators and other inspectors to the Compliance or Legal Department, or a Department Head, to handle directly. You should immediately forward any subpoenas, civil investigative demands, or similar legal demands or proceedings to the Legal, Corporate Compliance and Risk Departments.

Only authorized Southcoast Health employees may deal directly with regulators and government representatives. This protects Southcoast Health, employees and others. You should never lie or deceive regulators or other enforcement agencies. There are severe sanctions and legal penalties for doing so.

Political Activities

As a charitable organization, Southcoast Health is not allowed to engage in political activities, either by participating in campaign events or making political contributions. You may not use Southcoast Health resources to support a political cause or event, except as allowed by federal or state law and approved by the Legal Department. You may exercise your rights to vote and to make political contributions in your personal capacity, but you cannot use your position at Southcoast Health or Southcoast Health resources in this political activity.

Excluded Individuals and Entities

Southcoast Health does not do business with individuals and organizations that are not allowed to participate in government health programs such as Medicare and Medicaid. Southcoast Health regularly checks government-issued lists of excluded individuals. We include terms in vendor contracts that address exclusion.

As a Southcoast Health employee, staff-member or business or service provider, you should:

- Report any regulatory or legal communication, order or ruling that may cause your exclusion from participating in government health programs.
- Report to your manager or Corporate Compliance if you know of any person or organization doing work for Southcoast Health who/that has been sanctioned or disciplined or is being investigated by a government health program.



Patient Confidentiality and Medical Records

Patients share a great deal of confidential medical data with us, including family medical histories, personal medical histories, diagnoses, prognoses, test results and medications. Southcoast Health must follow many federal and state requirements on patient confidentiality, privacy, and maintaining and disclosing of medical records.

These requirements include the Health Insurance Portability and Accountability Act and its implementing regulations (“HIPAA”), laws on the use and disclosure of substance use disorder treatment records, and state laws on health care recordkeeping and heightened confidentiality protections for certain types of records.

Southcoast Health supports an electronic health record system that allows us to maintain and store records securely and to access to records as needed for authorizations. Every patient at Southcoast Health has the right to confidentiality of records and communications in keeping with law and to view and receive a copy of their medical records. They also have the right to privacy during medical treatment.

We follow all laws and give every patient or their representative a notice of privacy practices as part of hospital or program admission.

To uphold patient confidentiality, never:

- Disclose or access patient information unless necessary and authorized.
- Discuss a patient’s confidential matters in public places, such as elevators, waiting rooms, at home, planes or restaurants.
- Post patient information on social media networks and websites, even if we think it does not reveal a patient’s identity.

Southcoast Health has a comprehensive HIPAA Privacy and IT Security program that meets the following standards:

- Our IT Security Department does an annual security risk assessment.
- We track and monitor HIPAA concerns and report any disclosures.
- We continually monitor IT security and privacy risks.
- We use secure phone and computer networks in our communications.
- When working with patient records, we use only approved systems for transmitting information.
- We take HIPAA compliance seriously and use corrective action when needed.
- If we suspect a HIPAA violation or a leak of confidential patient information, we report it within 60 days as required by the HIPAA Privacy Rule.

If your friends, neighbors or colleagues are in the hospital, and you are not involved in their care, you cannot read or view their protected health information (PHI). You may only see this kind of information if you need it to fulfill your job responsibilities.

Being the best we can be

As a workforce member, I receive my medical care here. Is my medical record kept confidential?

Yes. Southcoast policy requires all employees to respect the confidentiality of every patient and their information. Confidentiality standards are the same for ALL patients.

