

Code of Conduct

at Stamford Hospital

STAMFORD HOSPITAL | Discover More The Regional Center for Health

Affiliate Columbia University-College of Physicians & Surgeons
Member NewYork-Presbyterian Healthcare System
A Planetree Hospital

As a Planetree hospital, we are committed to personalizing, humanizing and demystifying the healthcare experience for patients and their families. Our approach is holistic and encourages healing in all dimensions—mind, body and spirit.



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Dear Staff,

One of the principal guidelines we use as an organization to demonstrate our commitment to upholding the trust and confidence of our community, is the code of conduct we all adhere to on a daily basis. As part of our ongoing corporate compliance efforts, we spent the last year developing a code of conduct in order to enhance the organization's high-level of ethical standards.

This code has been developed and adopted by the Board of Directors to state clearly the behaviors we will each follow and look for in the conduct of others. It is grounded in our core values—teamwork, compassion, integrity, respect and accountability—with the understanding that those who follow its guidelines will truly be living those values in their activities at Stamford Hospital. The code impacts everyone associated with the hospital—employees, contractors, members of the medical staff, students and volunteers.

Over the next year, we will all become more familiar with the new code of conduct as it will be discussed at staff meetings, promoted in Newsline, introduced in new employee orientation and become part of the annual mandatory regulatory training for all employees. More importantly, it will be exemplified in all our behaviors.

As always, if you have any questions or concerns on any compliance matters, you can contact Ruth Cardiello, Corporate Compliance Officer at ext. 7533, or you can make an anonymous call through the confidential compliance hotline at 1.800.826.6762.

Brian Grissler
President & CEO

Introduction

Stamford Hospital is committed to ensuring that all employees share in the responsibility for keeping the Hospital in full compliance with all laws and regulations governing ethical business practices. This brochure explains the expected behavior and conduct of all employees, volunteers, members of the Board of Directors and members of the Hospital's medical staff in our workplace.

This is your copy of the System's Code of Conduct. It has been designed to be a clear and concise guide. Please familiarize yourself with it to ensure understanding.

This Code of Conduct addresses various issues including the following:

- Patient care
- Confidentiality
- Compliance with laws and regulations
- Conflicts of interest
- Coding and billing integrity
- Workplace safety
- Workplace conduct including discrimination
- Protection of assets
- Use of patient information

This Code of Conduct is a broad guideline which is reinforced in greater detail by the various policy and procedure manuals utilized throughout the Hospital. It is the responsibility of every employee, volunteer, member of the Board of Directors and medical staff member to act in a manner consistent with this Code, the values and principles it expresses, and its supporting policies.

The Hospital's Code of Conduct is a "living document" that will be updated periodically. If you have suggestions, recommendations or ideas for improving the Code, please contact the Corporate Compliance office at 203.276.7533.



Stamford Hospital will:

Provide Excellent Patient Care. Providing quality of care, while respecting the rights of patients, is the central focus of the Hospital. We are committed to providing services that meet and exceed patient expectations while focusing on continuous improvement of quality. Stamford Hospital employees will treat all with a spirit of kindness, patience and understanding. Each patient should be respected, with their needs and desires considered as health care decisions are made. Steps shall be taken so that each patient understands his or her treatment needs and options, treatment methods utilized, and treatment outcomes. Stamford Hospital will provide services in a manner that does not discriminate against any person because of age, race, religion, gender, sexual orientation, disability, national origin, ability to pay or for any other reason prohibited by applicable Federal and State law. At all times, competent and qualified individuals will provide appropriate, medically necessary care, while considering the safety and well being of the patients.

Stamford Hospital shall provide an appropriate medical screening examination to any individual who seeks emergency medical treatment, regardless of ability to pay, and such further medical examination or treatment as required to stabilize any emergency medical condition, or provide a medically appropriate transfer, and will not delay a medical screening examination, or any further examination and treatment required, in order to inquire about the individual's method of payment, ability to pay or insurance status.

Protect Confidential Information. Stamford Hospital is committed to maintaining the confidentiality of patient, personnel, financial and other proprietary information in accordance with applicable legal and ethical standards. Any use or disclosure of any patient information that is not in compliance with Federal and State law, and the Hospital's policies and procedures, is strictly prohibited.

Comply with the Laws, Regulations and Accreditation and Internal Standards.

Stamford Hospital is subject to numerous local, Federal and State laws, regulations and internal standards pertaining to all aspects of its operation. All employees are required to understand and abide by those laws, regulations and standards which are applicable to them in the performance of their jobs. All employees must be knowledgeable about, and ensure compliance with, all laws and regulations applicable to the performance of their job, and performance evaluations will take these factors into account. It is the responsibility of each employee to immediately report any violations or suspected violations of any legal requirements or accreditation standards to a supervisor, administrator and/or the Compliance Officer. All employees will deal with accrediting and regulatory bodies in a direct, open and honest manner.

Adhere to Anti-Referral and Health Care Fraud and Abuse Legislation.

All employees of Stamford Hospital are required to comply with any and all laws which prohibit health care fraud and abuse. We shall not engage in any illegal or unethical business practices. Contractual/financial arrangements with physicians, vendors, third party payors, managed care organizations or other referral sources will be structured to ensure compliance with applicable Federal and State laws and regulations, fulfill the mission of the Hospital, and be in the best interests of the Hospital and the patients we serve. Stamford Hospital expects employees to refrain from conduct that violates Federal and State anti-kickback statutes, as well as the "Stark" physician self-referral laws and regulations. Simply put, we do not pay for referrals or otherwise unlawfully attempt to induce referrals to the Hospital.



Activities that are prohibited include, but are not limited to:

- Intentionally or knowingly making false or fraudulent claims for payment or approval;
- Offering or receiving anything of value (cash or in kind) as an inducement to make a referral for the furnishing of any item or service;
- Offering or receiving anything of value (cash or in kind) as an inducement or in return for the purchasing, leasing, ordering, or arranging for or recommending the purchasing of any goods, facility, service or item; and,
- Submitting false information for the purpose of gaining or retaining the right to participate in a plan or obtain reimbursement for services.

Avoid Inappropriate Gifts & Gratuities. Employees are prohibited from soliciting or accepting tips, personal gratuities or gifts from patients, vendors, contractors and other third parties. Employees may, however, accept unsolicited non-monetary gratuities or gifts of a nominal value, such as cookies, flowers or candy if the gift would not influence, or reasonably appear to others to be capable of influencing, the employee's business judgment. If the value of the gifts are over \$300, as per Stamford Hospital policy, or there is any question regarding whether acceptance of the gift would comply with Stamford Hospital policies, the employee must seek prior approval from the Corporate Compliance Office or refuse the gift and promptly return the gift to the vendor or patient. Employees shall not offer or give money, services or other things of value with the expectation of influencing the judgment or decision making process of any purchaser, vendor, patient, governmental official or any other person.

Avoid Conflicts of Interest. It is the policy of Stamford Hospital to prohibit its employees and other associates from engaging in any activity, practice, or act which conflicts with, or appears to conflict with, the interests of Stamford Hospital, or its patients. Employees are expected to conduct the business of the Hospital to the best of their ability and for the benefit of the Hospital and its patients. Employees must be careful not to create any conflicts of interest (actual or perceived). The policy also requires board members, officers, senior leaders, medical staff leaders, committee members and other individuals as appropriate to disclose any potential conflict of interest they or their immediate family may have, including any interest in or relationship with any individual or organization which does business with Stamford Hospital or which competes with Stamford Hospital. Stamford Hospital manages its contractor and supplier relationships in a fair and reasonable manner, consistent with all applicable laws and good business practices. Our selection of contractors, suppliers, and vendors will be made on the basis of objective criteria, and not on personal relationships and friendships.

Coding and Billing Integrity. Stamford Hospital is committed to the proposition that all payments and other transactions must be properly documented and authorized by management. Employees are expected to adhere to the rules and regulations regarding documentation. All transactions must be accurately and completely supported in the Hospital's books and records. Further, all billing practices and compilation of, and filing of, cost reports must comply with all Federal and State laws and regulations. Activities that are prohibited, but not limited to, include:

- Knowingly submitting a claim or bill for services that were not rendered or accurately described on the claim form or statement, nor shall we misrepresent services which were rendered, or alter a medical record;



- Submitting a claim requesting payment or bill a third party for medically unnecessary services, or seek reimbursement for a service that is not warranted by the patient's current medical condition as documented in the medical record and physician's orders;
- Knowingly submitting claims for payment that have not been properly coded, documented or billed according to applicable laws and regulations;
- Submitting bills in a piecemeal or fragmented fashion to maximize reimbursement for various test or procedures that are required to be billed together and therefore at a reduced cost ("unbundling"), nor billing separately for each component of a group of procedures that are commonly used together for which Medicare and/or Medicaid provides a special reimbursement rate; or
- Submitting more than one claim for the same service or submitting a bill to more than one primary payor at the same time ("duplicate billing").

Employees shall assist Stamford Hospital in identifying and appropriately resolving any coding and billing issues or concerns identified. Stamford Hospital will refund overpayments made by a Federal health care program or other payor.

Keep Accurate and Complete Records. It is essential that Stamford Hospital report accurate information to governmental entities and other third parties. In order to meet this obligation, it is equally essential that every employee accurately and clearly report the relevant facts or the true nature of a transaction. No employee should knowingly or with reckless disregard for the truth make any false or misleading statement on any form or to any other officer, employee or auditor for Stamford Hospital. All patient records must meet the documentation standards required for quality care and to meet reimbursement regulations. Employee travel and entertainment related expenses

must be accurately documented and supported when seeking reimbursement from the hospital. All medical and business documents and records are retained in accordance with the law and Stamford Hospital's record retention policy.

Conduct Political Activities According to the Law. Stamford Hospital expects each of its employees to refrain from engaging in activity that may jeopardize the tax exempt status of the Hospital. Stamford Hospital funds or resources may not be used to contribute to political campaigns or for gifts or payment to any political party or any political organization. Stamford Hospital does not participate or intervene in (including the publishing or distributing of statements) any political campaign on behalf of or in opposition to any candidate for public office. While the Hospital supports employee participation in the political process, employees are not permitted to use positions in Stamford Hospital to try to influence the personal decisions of others to contribute or otherwise support political parties or candidates except as lawfully permitted through political action committees. Stamford Hospital may participate in lobbying activities or advocating the passage or defeat of certain legislation that pertains to issues that affect the healthcare community and as such complies with the state's ethics requirements. Lobbying activities, or advocating the passage or defeat of certain legislation, shall not constitute a substantial part of the activities of Stamford Hospital.

Protect the Environment. It is the policy of Stamford Hospital to comply with all Federal and State laws protecting the environment. Employees shall dispose of all waste and other materials and store all chemicals and substances in accordance with applicable laws and regulations. It is important to file all necessary environmental reports accurately and promptly and to cooperate fully with all governmental authorities in the event of an environmental incident.



Provide a Safe Workplace. It is the policy of Stamford Hospital to comply with all applicable Federal and State laws designed to improve workplace safety. Stamford Hospital is committed to training employees to carry out their work in a manner that is safe for them, their coworkers and the patients they serve. We shall ensure high-quality healthcare through the provision of educational training and teaching experiences for all employees.

Not Tolerate Harassment or Discrimination. Stamford Hospital recognizes that all employees, regardless of job classification, belong to a knowledgeable and skilled health team which contributes to patient care. We want to create a caring and positive environment in which all employees are treated fairly. It is Stamford Hospital's policy not to discriminate on the basis of race, color, religion, national origin, age, disability, sexual orientation or gender in providing services to patients or the public, nor in relation to employment practices. Furthermore, Stamford Hospital prohibits harassment of its employees in any form by supervisors, coworkers, patients, medical staff members or vendors.

Safeguard and Appropriately Use Assets. All employees are charged with protecting and preserving Stamford Hospital's assets and resources by following procedures to prevent their loss, theft or unauthorized use. Further, Stamford Hospital and its employees must make every effort possible to ensure that the property of our patients is safeguarded. Stamford Hospital shall ensure that the assets of the Hospital are used properly and in a manner that supports the best interests of the organization and its patients. No part of the net earnings of Stamford Hospital shall be used for the benefit of, or be distributed to, its Directors, Executive Staff, employees or other private persons having directly or indirectly any personal or private interest in the activities of Stamford Hospital, except to the extent that such payments constitute reasonable compensation for services rendered in the necessary course of Stamford Hospital's business.

Protect Access to Information Systems. Stamford Hospital is committed to protecting all aspects of its information systems. All employees and other associates with access to Stamford Hospital's computerized information system shall abide by Stamford Hospital's Policies, including the protection of confidential user-ids and passwords. All computers, PDA's, pagers, communication systems, electronic mail, fax, networks (including internet access) and voicemail are the property of Stamford Hospital and are to be used for business purposes only.

Adhere to Intellectual Property Laws. Stamford Hospital is committed to adhering to all applicable intellectual property laws. All software used in connection with Stamford Hospital's business must be properly licensed and used in accordance with that license. Additionally, Stamford Hospital will respect the intellectual property and copyright laws regarding books, trade journals, magazines and other applicable resources.

If anyone has any questions or concerns on any compliance matters, you may raise your concern to the Corporate Compliance office at 203.276.7533 or the Corporate Compliance Hotline at 1.800.826.6762. Retaliation for raising concerns is unlawful and will not be tolerated by Stamford Hospital.