

TABLE OF CONTENTS

Letter from the President and Chief Executive Officer	2
Mission, Vision, Core Values	3
How to Use This Booklet	4
Our Responsibility	5
The Role of Management	5
Non-Retaliation	6
Failure to Follow the Code of Conduct	6
Acknowledgement	6
Standards of Behavior	7
Quality Care	7
Safeguarding Protected Health Information	8
Environment of Care and Safety	9
Work Environment	10
Compliance with Laws and Regulations	11
The False Claims Act	13
Billing and Coding	14
Protection and Use of Property and Assets	15
Conflicts of Interest	16
Solving Concerns and Reporting Issues	17
How To Raise a Concern	17
Compliance Hotline	18
Questions to Ask Yourself	19
Certification and Acknowledgement Form	20

LETTER FROM THE PRESIDENT

To my fellow members of the ECHN team:

ECHN is committed to meeting the medical needs of all those who live in our 19-town service area. Just as our patients, residents and clients expect us to provide high quality health care services at all times, they also expect us to demonstrate the utmost integrity in all of our actions, whether in decisions regarding their care or in our business dealings.

Our core values of Teamwork, Respect, Communication and Caring signal our intent to work together to follow rules, obey laws, treat all individuals fairly and with reverence, and to speak up whenever we are uncertain or unsure about our responsibilities or what we are being asked to do. These actions help assure we obtain the trust and confidence of all those who rely on us for care and treatment.

This Code of Conduct is a brief summary of the principles we follow as we go about our work. It does not replace our policy manuals. In fact, our policy manuals indicate how we adhere to the principles outlined in the Code of Conduct in all of our daily activities and how the Code impacts all of our actions at ECHN. The Code serves also as the basis of our Corporate Compliance Program, offering a roadmap to guide us in the direction of integrity, responsibility and caring. Please take the time to read the Code and familiarize yourself with its contents. Always keep it nearby for a quick reference should you have any questions or concerns.

Each of us contributes to making ECHN a special place for healing and care. Through an unwavering commitment to honesty, integrity and quality, we can make ECHN extraordinary. Thank you for all of your efforts.

Sincerely,

Peter J. Karl
President and CEO

EASTERN CONNECTICUT HEALTH NETWORK

Mission

Improving the health of our communities with competence and compassion.

Vision

ECHN will provide health care services that exceed the expectations of our patients, physicians and community by:

- Anticipating and responding to community need;
- Collaborating with other providers, competing effectively, aligning resources with priorities and providing professional education to deliver clinical quality in a safe environment;
- Optimizing the use of resources by integrating and streamlining operations;
- Developing motivated, committed competent and compassionate employees;
- Practicing our core values of teamwork, respect and communication in a caring environment;
- Creating a culturally responsive atmosphere;
- Investing in technology to enhance our quality of care and connect us to our partners in care;
- Creating opportunities to assure long term financial strength.

Core Values

Caring • Teamwork • Respect • Communication

HOW TO USE THIS BOOKLET

At ECHN, we are committed to providing safe, efficient, and exceptional patient care. Incorporating our core values of Caring, Teamwork, Respect, and Communication, we seek to always do the right thing no matter what our duties are. This Code of Conduct provides a summary of the standards of behavior that are expected to be followed by every member of the ECHN family. Individuals covered by this Code of Conduct are the Board of Trustees and Officers and Directors, employed physicians, employees, volunteers and contractors of ECHN and its affiliates including Manchester Memorial Hospital, Rockville General Hospital, the ECHN Community Healthcare Foundation, the Women's Center, Woodlake at Tolland, and ECHN Health Services.

This Code of Conduct should be used as a quick reference and a reminder of our standards of behavior. It should not take the place of ECHN's policies and procedures.

Our behavior reflects our values. It is the responsibility of each of us in the ECHN family to comply with this Code of Conduct. Failure to comply can result in potential violation of the law, serious damage to our reputation, and inquiry or prosecution by authorities.

Our Responsibility

The healthcare environment is complex. There are regulations and requirements for everything we do. We believe that every member of our organization wants to do the right thing. We have a responsibility to ask questions. We also have a responsibility to speak up if we see or think we see a violation of a law, regulation, policy, or if we observe a breakdown in the quality of care provided to our patients and residents. Not reporting a possible violation is just as serious as actually breaking the rules.

Where do we go when we have questions? We are encouraged to speak first to our supervisor or manager, then to our director, or vice president. Others who can help are the Human Resources Department, the Legal Affairs Department, the Medical Affairs Office, Risk Management, and the Compliance Officer. We also have a special telephone line we can use called the Compliance Hotline — 860-646-1222 extension 3656 — which allows us to ask questions or report concerns confidentially and anonymously. For more information, please refer to the section entitled “Solving Concerns and Reporting Issues” in this document.

The Role of Management

Managers and supervisors have a special responsibility to help us obtain the answers we need. Reflecting our core value of *communication*, managers have a responsibility to make sure that the work environment allows staff to ask questions and discuss concerns without fear of punishment or retaliation. Managers may not always know the answers to our questions or concerns, but they have a duty to help us find the answers. They can put us in touch with persons at ECHN who have the knowledge or ability to help us.

Non-Retaliation

We cannot be punished for asking questions or for reporting in good faith a violation or possible violation of our policies, standards, or laws and regulations. “Good faith” means that we honestly believe there has been a violation or possible violation. Intentionally making a false report is also a violation of our standards of behavior.

Failure to Follow This Code of Conduct

Those who fail to comply with this Code put ECHN at risk and will be subject to corrective action, including re-training, verbal or written warnings, suspension, demotion, termination of employment, disclosure to law enforcement or licensing agencies, or other disciplinary measures as described in the Human Resource policies.

Acknowledgement

We are required to sign an acknowledgement confirming that we received a copy of this Code of Conduct and agree to read it and abide by its principles.

STANDARDS OF BEHAVIOR

The following statements listed under their corresponding behavior standard are not all inclusive. We urge you to check the ECHN policies or ask your manager for clarification.

Quality Care

We are committed to providing quality care to our patients and residents that is sensitive, compassionate and cost effective.

We will treat all patients and residents with dignity and respect.

We will not treat our patients or residents differently based on race, age, ethnicity, religious beliefs, gender, sexual orientation, national origin, disability, veteran status, or ability to pay.

We will provide appropriate care promptly to all patients and residents.

We will involve patients and residents in decisions regarding their care.

We will report errors or unanticipated outcomes promptly and accurately.

We will only employ caregivers who are properly licensed, credentialed and trained.

We will maintain medical records and other documentation according to ECHN guidelines, Medical Staff Bylaws, Rules and Regulations, accrediting agencies and state and federal regulations.

We will follow the Emergency Medical Treatment and Active Labor Act (EMTALA) in providing emergency treatment based upon medical necessity and without regard to the patient's ability to pay.

Safeguarding Protected Health Information

We are committed to respecting the confidentiality of our patient and resident information.

We will keep our patients' and residents' information private, following the requirements of the Health Insurance Portability and Accountability Act (HIPAA).

We will utilize patient and resident information for treatment, payment and operations, and only on a need-to-know basis.

We will dispose of confidential documents only in designated containers.

We will release information to business partners only in accordance with proper procedures and usually with the written consent of our patients and residents.

We will not discuss or share the health information of our patients and residents outside the function of our jobs.

We will wear our badges where they can be seen during working hours.

We will not share computer login IDs and passwords to access patient or resident information.

We will provide computer access to staff and others only as required by their role and job requirements.

Whenever possible, we will secure our computer systems from unauthorized access.

Environment of Care and Safety

We are committed to an environment that minimizes hazards and the risk of injury and illness to our patients, residents, staff, physicians and visitors.

We will follow safety codes provided by ECHN as well as applicable laws, regulations, and accreditation standards (Joint Commission, OSHA, EPA, DPH, NRC, etc.)

We will follow all laws related to the disposal of medical or hazardous waste.

We will promptly report all incidents involving injury to a patient, resident, staff member, physician or visitor.

We will promptly report all spills or incidents involving hazardous materials and take prompt action to remedy the situation.

We will regularly participate in disaster drills within the organization, according to policy.

We will prohibit the manufacture, distribution, sale or use of illegal drugs or alcohol at our facilities.

We will safely store and count all drugs and pharmaceuticals and report missing drugs to management and other appropriate authorities.

We will seek to continuously research, improve and adopt safety measures.

Work Environment

We are committed to creating a safe work environment by treating all staff members with fairness, dignity and mutual respect.

We will abide by ECHN's Core Values of Caring, Teamwork, Respect and Communication.

We will prohibit discrimination on the basis of race, color, religion, sex, national origin, age, handicap, veteran status or other characteristics protected by law.

We will strive to create a workplace and patient care area free of sexual or other harassment and workplace violence.

We will provide and maintain a safe and healthful work environment free of substance abuse.

We will show respect and consideration for one another, regardless of role or position within ECHN.

We will develop our talents and skills by participating in training provided for us by ECHN.

We will encourage continuous improvement by respectfully considering the ideas and observations of all staff.

We will utilize fair and equitable disciplinary practices.

Compliance With Laws and Regulations

We will uphold all laws and regulations while conducting business and providing quality care.

We will not provide or accept anything of value (such as bribes, kickbacks or other forms of payment) in order to influence the referral of patients or services.

We will act in honor and fairness in all our business transactions.

We will obtain in writing all agreements with others to provide products or services, and we will make sure the agreements are approved by appropriate management.

We will prepare and maintain medical and business records truthfully and accurately.

We will bill only for services which we have provided that are medically necessary, fully documented, in accordance with all applicable laws and regulations.

We will not knowingly employ or contract with persons or businesses that have been excluded from government programs.

We will follow Internal Revenue Service (IRS) regulations and federal and state labor laws.

Compliance With Laws and Regulations (continued from page 11)

We will reflect accurate, timely and complete information in our annual cost reports to Medicare and state welfare programs.

We will cooperate fully with federal, state and local law enforcement authorities or agencies conducting investigations.

We will promptly report to management or the compliance officer any possible violation of ethical standards, laws, regulations or policies.

We will not make our facilities or assets, including staff work time, available to a political candidate or a political campaign.

We will dispose of records and documents (paper and electronic) according to the ECHN Record Retention Policy, unless instructed not to do so by our manager.

We will seek all donations and support for ECHN and its programs through the ECHN Community Healthcare Foundation.

The False Claims Act

The False Claims Act is a federal law that makes it a crime for any person or organization to knowingly make a false record or file a false claim for payment with the government. The False Claims Act was first adopted during the Civil War as a way for the government to prosecute persons who overcharged the government for supplies it purchased during the war.

Today the Federal False Claims Act can be used to prosecute providers who purposely send false claims to Medicare or Medicaid, including those who recklessly disregard the possibility that the claims being sent for payment could be incorrect. An organization or provider who submits false claims to the government may be fined between \$5,500 and \$11,000 for each claim plus damages. Examples of false claims are:

- Bills for services that were not provided.
- Bills for services not ordered by the physician or were not medically necessary.
- Sending two bills for the same service (double-billing).
- Billing for sub-standard care.

To encourage individuals to come forward and report misconduct, the False Claims Act has a “whistle-blower” provision. This provision allows a person with actual knowledge of false claims activity to file a lawsuit on behalf of the government. If the government pursues the case and funds are recovered, the individual who initiated the charge will generally receive between 15% and 30% of the amount recovered by the government.

In addition to the financial incentive, the False Claims Act entitles the whistle-blower to reinstatement of their job, back pay, and any other compensation arising from retaliatory conduct by the employer toward the employee for filing an action or assisting in proving the occurrence of fraudulent activity.

Billing and Coding

We will take great care to assure that all billings to patients, the government and private payers reflect the truth and comply with all federal and state laws and regulations.

We will only bill for appropriately documented and medically necessary services.

We will not knowingly submit duplicate claims.

We will not engage in upcoding, unbundling or any other means of artificially increasing reimbursement.

We will not routinely waive insurance co-payments or deductibles.

We will make patients aware of programs for which they may qualify that will help them with payment of their bills.

We will promptly refund all duplicate payments or credit balances.

We will maintain our computer systems, including software edits, to ensure our bills comply with federal and state requirements.

We will strive to stay current with all changes in billing and coding regulations.

Protection and Use of Property and Assets

We are committed to protecting our business assets, including clinical equipment, facilities, and information, against loss, theft, destruction and misuse.

We will properly use and care for all equipment entrusted to us in our jobs.

We will maintain and secure all supplies and use them only for medical care or other business purposes.

We will dispose of all obsolete or surplus property according to policy.

We will not permit the creation of unauthorized copies of computer software.

We will not place personal software on computers owned by ECHN.

We will protect patient belongings to the best of our ability.

We will use all communications systems — electronic mail, telephone, Internet, intranet — for business purposes, with occasional personal use as permitted by policy.

Conflicts of Interest

We are required to disclose conflicts of interest or potential conflicts of interest to our supervisors or administrative representatives in accordance with the ECHN Conflict of Interest Policy.

A conflict of interest may occur when our personal interests or outside activities influence — or appear to influence — our ability to make objective decisions in our job or board-related activities. Although this is not a complete list, these are some examples of potential conflicts of interest that we should discuss with our supervisor or administrative representative:

- An ownership interest in a vendor from whom ECHN purchases goods or services. (*This generally does not apply to stock ownership.*)
- An interest in property that ECHN or one of its affiliates is buying or leasing, or considering buying or leasing.
- Working for an organization that does business with ECHN.
- Soliciting or accepting personal gifts or other goods over \$50 in value, including meals and entertainment, from any person or entity that does or seeks to do business with ECHN.
- Disclosing or using confidential ECHN business information for personal profit or advantage.
- Having direct responsibility for the hiring or supervision of a family member.
- Using ECHN assets to conduct personal business, including conducting personal business during working hours, and use of ECHN computers, copiers, supplies and postage.

How To Raise a Concern

We have a responsibility to speak up when we have a concern. ECHN is committed to an “open door policy” for identification and resolution of issues and concerns. If we have a question or concern about an activity being unethical, illegal or wrong, we start with our supervisor or manager. The management staff is committed to being accessible and to providing guidance. No question is a “silly question.” Healthcare is full of complex regulations. We should all ask as many questions as we need to ensure the highest quality of care and service is provided to our patients and residents.

If we are not satisfied with the response to our concerns, we may contact another member of management or a representative from a department likely to have the information we are seeking, such as Human Resources, the Medical Affairs Office, Risk Management, or the Legal Affairs Department. If we are uncomfortable raising the issue through the chain of command or we still are not satisfied with the response to our concerns, we should call the Compliance Officer at extension 3652. We may also call the Compliance Hotline, anonymously, if we wish.

Compliance Hotline: 646-1222, Ext. 3656

While we are encouraged to bring our questions and concerns through the chain of command, the Compliance Hotline is available to everyone at any time. The Compliance Hotline is answered in the Compliance Office between the hours of 7 am and 5:30 pm. Voice mail is available at other times.

Calls to the Hotline cannot be traced or recorded so that concerns can be reported anonymously. All calls will be investigated by the Compliance Officer or personnel whom the Compliance Officer appoints due to their knowledge or expertise. We should provide as much detailed information about the issue as we can when we call, including when and how we first learned of the situation; whether the activity is still occurring; what departments or individuals are involved; and who else might have information about the issue.

The Compliance Officer will respond to all concerns and inquiries in an impartial manner. The Compliance Officer will respect and protect the rights of all individuals, including anyone who may be the subject of a hotline complaint. All issues will be thoroughly investigated before action is taken.

Examples of hotline call issues include but are not limited to:

- HIPAA privacy or security violations;
- Issues regarding charging/billing/coding or collecting for services;
- False or misleading financial reporting;
- Theft or misuse of supplies or equipment;
- Patient abuse;
- Conflicts of interest;
- Illegal or unethical behavior.

Questions to Ask Yourself

- Does this activity feel right?
- Is anyone being harmed by this activity — physically, financially, emotionally?
- Would I feel good admitting that I participated in this activity?
- Would my friends and family be embarrassed by what I am doing?
- How would it look in the newspapers?
- What if someone did this to me or my family?

Certification and Acknowledgement

I have received and will read the ECHN Code of Conduct.

I understand that the Code of Conduct applies to my employment, my board membership, or my contracted relationship with ECHN and its affiliates.

I agree to abide by the principles described in this Code.

I will report in good faith knowledge of any activity that I observe or am made aware of that is illegal, unethical or a serious violation of ECHN's policies.

Printed Name _____

Position _____

Department _____

Signature _____

Date _____