

Corporate Compliance Code of Conduct

(mini-handbook)



OFFICE OF CORPORATE COMPLIANCE
413-794-5840



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Baystate Health **Compliance Handbook**

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Baystate Health is a leading not-for-profit health system with the charitable mission of improving the health of the people in our communities every day, with quality and compassion.

Our Mission

The mission of Baystate Health is to improve the health of the people in our communities every day, with quality and compassion.

Our Operating Principles

We strive to meet our mission and perform all of our work with our operating principles of:

- Trust
- Integrity
- Respect
- Collaboration
- Communication.



Mark R. Tolosky,
President & CEO, Baystate Health

In our organization, corporate compliance means more than just following laws, policies and procedures. It means practicing strong ethical standards in everything we do. Our high standards allow us to deliver excellent care to patients, families, and our communities.

Integrity and honesty are an integral part of these standards. Simply stated, our philosophy is to do the right things right.

Your commitment will greatly benefit Baystate Health, and the community we are privileged to serve.

A handwritten signature in blue ink that reads "Mark R. Tolosky". The signature is written in a cursive, flowing style.

Corporate Compliance

The reputation of Baystate Health has a significant impact on every relationship we maintain. It influences how patients feel about the care they receive, how the community feels about us as a neighbor, and how employees feel about Baystate Health as a place to work. Because our success is so closely related to our reputation, it is up to us to keep it strong—to act with honesty, integrity and respect.

As a representative of Baystate Health, you hold our reputation in your hands. With your help, our organization will continue to be an outstanding citizen in every community we serve, and our reputation for integrity will endure.

Thank you for supporting this effort.

Code of Conduct Overview

To fulfill the goals of our mission successfully and ethically, and to provide excellent patient care, Baystate Health has established helpful guidelines for employees to follow. This mini-handbook, also known as the Code of Conduct, summarizes the values, policies and practices that guide our conduct.

Find the complete Code of Conduct and Baystate Health policies on eWorkplace. Please select the Department tab, then Corporate Compliance or ask your manager for assistance.

Asking Questions and Reporting Concerns

Baystate Health employees, physicians, contractors, consultants, volunteers, and other on-site agents are expected to report any violation of the Baystate Health Code of Conduct, Statement of Organizational Ethics, policies and procedures, and laws and regulations. We owe it to our patients, our colleagues and the communities we serve to report known or suspected violations.

You may ask a question or report a concern or violation by:

- Telling your Supervisor
- Calling your HR Consultant or local Human Resources Office with human resources related issues.
 - 413-794-4747 (Springfield)
 - 413-773-2295 (Greenfield)
 - 413-967-2113 (Ware)

If you are not comfortable reporting issues to your Supervisor or Human Resources, call the

- Baystate Health Corporate Compliance Office at 413-794-5840, or
- Compliance Hotline at 877-874-RIGHT (7444)

You are not required to reveal your name or department when you call. All reports will be investigated and action taken as appropriate.

Quality of Care & Services

Baystate Health is committed to providing high quality health care to our patients and to delivering health services in an ethical, professional and cost effective manner. We treat patients with respect and dignity and provide care that is necessary and appropriate.

- We provide equal access to care for all patients regardless of gender, gender identity or expression, color, age, sexual orientation, disability status, ancestry, race, religious or cultural beliefs, source of payment, or any other classification protected by law.
- We maintain complete and thorough records of patient information.
- We recognize the rights of patients to formulate an advance directive and we comply with that directive.
- All individuals employed to care for our patients are properly licensed and credentialed, and have the necessary experience and expertise. We are properly licensed and credentialed, have the necessary experience and expertise, and act in a respectful, collaborative and professional manner.
- All persons entering a Baystate Health emergency department and requesting a medical examination receive a medical screening exam to determine if an emergency situation exists. If one does exist, the patient is provided with medical treatment to stabilize the condition, without regard to the patient's ability to pay.

Confidentiality & Privacy

Baystate Health is committed to safeguarding our medical and business information. We only access the Protected Health Information we need to do our jobs. Access for any other reason is prohibited without permission, and could result in disciplinary action.

- We keep patient information confidential.
- We do not release patient information unless the release is supported by a legitimate clinical or business purpose, or a patient authorization.
- We do not discuss patient information in any public area such as elevators, common areas, dining halls, etc.
- In addition to patient information, access to sensitive business information, which may include salary, personnel and financial information, is protected and its dissemination is strictly limited.

Employment Practices

At Baystate Health, our greatest strength is our employees. Our reputation as an institution of outstanding patient care is built by our employees. We must encourage and support each other as we work toward common goals.

- We are an equal opportunity employer and we do not discriminate against employees or potential employees on the basis of gender, gender identity or expression, color, age, sexual orientation, disability status, ancestry, race, religious or cultural beliefs or other classifications protected by law.
- We comply with the contents of this Code of Conduct handbook, as well as with the policies and procedures applicable to our employment and responsibilities at Baystate Health.
- We comply with our harassment policies and behave appropriately in the workplace.
- We abide by Baystate Health policies prohibiting illegal possession, distribution, use or being under the influence of illegal drugs, alcohol or other substances. We support an alcohol-free, drug-free and smoke-free workplace.

Billing & Reimbursement

Baystate Health prepares and submits bills that accurately reflect the medically necessary services provided. These bills are supported by documentation in the medical record and are compliant with applicable rules, regulations and standards.

- We provide current coding, billing and reimbursement updates and training to our coding, billing and clinical staff in the areas of proper documentation, code selection, charge capture and reimbursement issues.
- If we discover errors, or notice areas for improvement, we notify the appropriate personnel to correct the issue in a timely manner.
- We provide financial assistance/counseling for patients who qualify through our financial assistance office.

Health & Workplace Safety

Baystate Health is committed to providing all employees and patients with a clean, safe and healthy work environment. To achieve this goal, we must recognize our shared responsibility to follow all safety rules, policies and practices.

- We wear our identification badges visibly above the waist.
- We act responsibly and collaboratively and treat everyone in a respectful and professional manner.
- We report any suspicious activity to Baystate Health Security.
- We follow laws and regulations relating to the environment, including those laws and regulations regarding the handling, storage, use and disposal of hazardous materials and infectious wastes.
- We wear proper protective equipment for our jobs, report spills promptly, and engage in hand hygiene.
- We follow emergency plans and know what to do in the event of a disaster or fire.

Information Security

Baystate Health protects its information and information systems from accidental or unauthorized access, disclosure, modification or destruction.

- We log off our workstations, never share our passwords, and always double check fax numbers before sending patient information.
- We do not install, share or copy software programs, or perform any other acts that would violate a vendor's software license agreement or organizational policies.
- We comply with the regulatory requirements, accreditation standards and organizational policy for the creation, management, retention and destruction of records.
- We report information security weaknesses and suspected or actual instances of computer and information theft or abuse to Baystate Health's Information Security Officer.

Conflicts of Interest

Baystate Health expects and requires employees to act honestly and ethically, and to avoid both actual and potential conflicts of interest with Baystate Health.

- We do not engage in any activity, practice or act that creates an actual or apparent conflict with the interests of Baystate Health.
- We disclose any actual or potential conflicts of interest to Baystate Health in accordance with policy.
- We act solely in the best interest of Baystate Health, whenever acting as an agent of Baystate Health, in dealings with suppliers, customers or government agencies.
- We may not accept personal gifts of any kind in any value from vendors. We may participate in business entertainment as long as there is a business purpose for the event and participation does not influence, or could be construed as influencing, any business decision. Please see our gifts policy for additional information.

Identifying Concerns

If you are not sure whether to report a concern or possible issue, consider the following:

- Is this issue in conflict with the Baystate Health Code of Conduct, values, policies and practices?
- Would others question this concern/issue?
- Are you repeatedly questioning the propriety of an action?

If the answer is “yes” please report the issue or seek further guidance.

Non-Retaliation

Baystate Health does not permit any form of retaliation against an employee who reports a suspected violation in good faith, participates in an investigation, or makes a report to a supervisor, the Human Resources Office, the Compliance Office or the Compliance Hotline.

Find the complete Code of Conduct and Baystate Health policies online at eWorkplace. Please select the Department tab, then Corporate Compliance or ask your manager for assistance.

Notes

**Do the right
things right**

*No matter what your role is at Baystate Health,
you are important in delivering the best
possible care to our patients.*