



CODE OF CONDUCT

MONTEFIORE COMPLIANCE PROGRAM

Montefiore



THE MONTEFIORE COMPLIANCE PROGRAM

The Montefiore Compliance Program aims to help associates understand constantly changing healthcare laws and regulations in order to stop problems from occurring and to resolve any issues that may arise. We strive to prevent and detect waste, fraud and abuse.

The program maintains policies and procedures that guide associates in carrying out their duties in compliance with legal and ethical requirements. We exercise sound judgment, care and diligence and are guided by the highest standards of ethics and Montefiore’s mission, vision, values and policies.

Our staff work together to promote the satisfaction of patients, associates, visitors and the community. We are committed to providing high-quality service in a caring environment that respects and protects patient rights

and supports the advancement of medical knowledge and the education of healthcare professionals. We maintain all business data, clinical records and reports completely, accurately and in a timely manner.

Please read the summaries and highlights of these laws and regulations in the following pages. Detailed policies and procedures are set forth in our Compliance Plan, which is available on the Montefiore intranet.

Sincerely,

Lynn Stansel, Esq.
Vice President & Counsel, Compliance



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OUR RESPONSIBILITY

“Compliance is everyone’s responsibility.” What does that really mean?

It means that everyone participates in the Compliance Program by participating in compliance education, reviewing our Code of Conduct, and remaining aware of policies and procedures. Managers can provide additional awareness opportunities for their associates. This can be done by routinely including compliance topics on the staff meeting agenda, by reviewing and discussing the most current policies and procedures, or by inviting in-house experts from different departments to discuss specific areas. Awareness creates knowledge, which is key to successfully creating an environment of accountability.

Reporting concerns so they are properly addressed is everyone’s responsibility, regardless of position. If a concern is identified but is not reported, there is the potential for that concern to remain “undetected.” This can place associates, customers and the organization at risk. Anyone can encounter an issue during day-to-day job activities. How we respond is important. Any identified actual or potential concern needs to be reported to those who can help ensure that the issues are properly investigated, evaluated and corrected. Montefiore has experts designated to respond to and address different types of issues. For this reason, it is important that the right people within the organization are notified. These experts can carefully assess all facts without bias and evaluate the process or system

at issue to determine the necessary response, thus ensuring that the regulations and standards are met and that matters are handled consistently and fairly.

Being accountable for compliance is different depending on our roles within the organization. Sometimes it’s about making sure our organization regains compliance in an area where an issue has been identified (corrective actions). Sometimes it’s about revising or drafting a policy or procedure to make sure we comply with a new or revised regulation, law or standard. Other times it’s about being aware of and maintaining licensing requirements and renewals, or being aware of and accountable for addressing changes to professional practice standards or financial requirements. When it comes down to it, we are all accountable to do the jobs we were hired to do, and that means we need to remain informed about relevant standards to carry out our duties properly. It also means we need to ensure that concerns are properly reported and addressed by the right individuals within our organizations. This assists in creating a safe reporting environment and a just and ethical culture.



CODE OF CONDUCT

All associates and providers of the institutions that are part of Montefiore Health System, its affiliates and subsidiaries are expected to be familiar with and adhere to Montefiore’s Code of Conduct, as well as specific policies, procedures and rules that apply to their positions and to Montefiore’s participation in state and federal programs, including the New York State Delivery System Reform Incentive Payment (DSRIP) program, Accountable Care Organizations (ACO), the Bundled Payments for Care Improvement (BPCI) program, among others. Everyone has a duty to report any suspected violations of the Code without fear of reprisal. Supervisors are expected to detect and act upon any violations.

Integrity and Honor: Our dedicated and talented associates and medical staff have chosen to work in the field of healthcare in a desire to serve others. Integrity and honor are central to Montefiore’s philosophy of care and dedication to public service.

Commitment: This Code affirms our commitment to the highest standards of ethics, professional service and quality healthcare as well as our steadfast compliance with all legal and regulatory requirements. It is the framework on which specific institutional policies and procedures are established.

QUALITY OF CARE

We are committed to providing high-quality, compassionate care to the residents of the Bronx, Westchester and beyond.

Single High Standard of Care: Patients with the same healthcare need(s) receive the same quality of care throughout Montefiore.

Credentials: Professional staff conduct their practices within the scope of their licenses and the privileges accorded them.

The Patients' Bill of Rights: This Bill guides all behavior toward patients and their families. Patient rights are emphasized in employee orientation and periodic associate educational sessions. Information is published in the admission packet and posted in public areas.

Individualized Care: We base each patient's plan of care on individually assessed needs. We protect the integrity of a care provider's decisions to order tests, treatments and other interventions based on those needs.

Comments: We recognize that patients, family members, visitors, community members, associates, volunteers and medical staff have the right to register comments about care and services without fear of reprisal. We acknowledge all concerns and promptly investigate and resolve all complaints to the fullest extent possible.

Alternative Facilities: We respect every patient's freedom to choose alternative facilities for his or her care and inform them about appropriate alternatives and whether they are related to Montefiore services.

Discharge: We will not transfer or discharge any patient from the medical center except in accordance with a safe discharge plan, regardless of source of payment. We never deny urgent or emergent care based on a patient's ability to pay for services.

Clinical Research: Clinical research is conducted under the oversight of the Institutional Review Boards of each institution. In order to make informed decisions about participation, patients receive information including the benefits, risks and alternatives of proposed studies.

DEFICIT REDUCTION ACT OF 2005

Montefiore is committed to complying with the requirements of Section 6032 of the Federal Deficit Reduction Act of 2005 and to preventing and detecting any fraud, waste or abuse in its organization. All associates, including management, physicians, consultants and vendors/agents who provide services, must comply with all applicable federal and New York State false claims laws and regulations.

Federal and state false claims provisions: In compliance with these provisions, Montefiore prohibits any associates (or contractors or agents acting on its behalf) from knowingly submitting to any federal or state-funded program a claim for payment approval that includes fraudulent information or is based on fraudulent documentation. Montefiore strives to educate our associates on fraud and abuse laws, including the importance of submitting accurate claims and reports to the federal and state governments, to assist the hospital in preventing fraud, waste and abuse in healthcare programs.

All persons covered by this policy have a duty to notify the Montefiore Department of Compliance of any suspected fraud, waste or abuse. Additionally, persons should consult with the Department of Compliance if they have questions related to how these laws apply to their job. The Department of Compliance maintains an anonymous hotline (1-800-662-8595 or www.montefiore.alertline.com) that can also be utilized to report any suspected violations.

To assist Montefiore in meeting its legal and ethical obligations, any associate who reasonably suspects or is aware of the preparation or submission of a false claim or report, or any other potential fraud, waste or abuse related to a federal or state-funded healthcare program, is required to report such information to his or her supervisor or Montefiore's Compliance Officer.

Any associate of Montefiore who reports such information has the right and opportunity to do so anonymously and will be protected against retaliation for coming forward under both Montefiore's internal compliance policies and federal and state law. However, Montefiore retains the right to take appropriate action against an associate who has participated in a violation of federal or state law or hospital policy.

Montefiore's commitment: As an organization, Montefiore commits itself to investigate any suspicions of fraud, waste or abuse swiftly and thoroughly and requires all associates to assist in such investigations. If an associate believes that the hospital is not responding to his or her report within a reasonable period of time, the employee shall bring these concerns about Montefiore's perceived inaction to the Department of Compliance. Failure to report and disclose or assist in an investigation of fraud and abuse is a breach of the employee's obligations to Montefiore and may result in disciplinary action.

INFORMATION PRIVACY AND SECURITY (HIPAA)

We protect the confidentiality of patient health information and Montefiore's internal information. This applies to information about patients, associates, medical staff, research and business affairs of Montefiore, and to spoken, written and electronic sources.

Patients and families trust us with highly personal and sensitive information regarding their medical conditions. We realize the sensitive nature of this information and are committed to protecting patient privacy. We are committed to complying with state and federal privacy laws.

We do not access or use patient information except as necessary to perform our jobs.

We access, use and disclose only the minimum amount of patient information needed to perform our jobs.

We do not discuss patient information with others who do not have a job-related need to know, including co-workers, colleagues, family and friends.

We do not share our user IDs or passwords to our electronic systems, and we log off when we step away from our workstations.

We assess our surroundings when speaking with or about patients and speak quietly, always asking patients for permission to speak to them when family or friends are present.

We verify written patient information to ensure that we do not mix one patient's information with another's, that fax numbers are accurate and entered correctly, and that patient labels are correct.

We dispose of written patient information in confidential disposal bins, and we contact IT for proper disposal of electronic patient information.

We encrypt all emails containing patient information that are sent outside of Montefiore's email system.

We use only Montefiore-approved personal devices, flash drives or cameras to store, download or capture patient information.

We report all privacy concerns or potential violations immediately to the Privacy Officer.

We report all information security concerns or potential violations immediately to the Information Security Officer.

Patient Rights Sensitivity: Montefiore's marketing and advertising activities are conducted with sensitivity to patient rights.

Social Media: We respect the privacy of patients/associates and follow hospital guidelines when engaging in social media. We do not mention or make reference to any patients on social networking sites or blogs.

CONFLICTS OF INTEREST

All institutional decisions are made fairly and objectively, without favor or preference based on personal considerations. We do not use our positions or knowledge gained for personal advantage.

Avoiding and Disclosing Conflicts: In performing our responsibilities at Montefiore, we do not let our judgment become impaired, or even appear to be impaired, by outside personal or financial interests.

Areas of Conflict: In the world of complicated business and other relationships, we may sometimes find that our duties to Montefiore may conflict, or appear to conflict, with another relationship. It is our duty to immediately disclose such a situation to a supervisor, manager or the Compliance Officer. Some conflicts have been managed by making sure that pertinent decisions are made by other associates or by ensuring that the person with the conflict does not participate.

Those who receive payments for lectures or other outside educational services (honoraria), have arrangements with pharmaceutical/device manufacturers or vendors to Montefiore, or are involved with sponsored research contracts or grants must be familiar with and comply with relevant Montefiore policies.

Gifts: We do not ask for or accept any gifts in exchange for services or that might appear to be for that purpose. Common sense should tell you when a gift is improper and should be refused to prevent embarrassment and avoid what may be an unintentional violation of

the law. Gifts of money are not accepted under any circumstance.

Gifts are never given to government employees in connection with a business transaction, even if the intent is not to influence an official action.

All gifts to Montefiore are processed through the Development Office.

Political Activity: As a tax-exempt corporation, Montefiore is prohibited from engaging in political activity and does not make campaign contributions or endorse candidates. Political campaign contributions may not be solicited on the premises. Montefiore resources (for example, stationery, fax, telephone or email) may not be used for political campaigns.

Referrals and Inducements: We do not offer or receive kickbacks or improper inducements to influence our decisions regarding patient referrals and/or purchases of supplies or services. No free goods, services, discounts, rebates or allowances are accepted without prior approval of the Purchasing Department.

Illegal Payments: No one at Montefiore makes or authorizes illegal payments or bribes to anyone, or authorizes any use of resources that, even if not illegal, could be interpreted as improper or unwarranted.

BILLING AND CODING INTEGRITY

Coding and billing processes are performed in accordance with all local, state and federal regulations and third-party payor contracts.

Services are billed with codes that accurately describe the care provided and are supported by documentation in the medical record.

Actual and Medically Appropriate Services: We bill only for medically appropriate services performed by properly licensed individuals.

Documentation of Services: We document all patient care services in an accurate, legible and timely manner consistent with all documentation, coding and billing requirements.

Electronic Health Record Documentation: We follow federal, state and local guidelines and maintain compliance as it relates to care rendered and documented within the electronic health record (EHR), including, but not limited to, appropriate access, authorship, timeliness of entry, and use of EHR functionality such as copy/paste, cloning, etc.

Coding and Claim Preparation: We prepare claims for services using appropriate codes that accurately describe the care provided and documented in the medical record.

We do not engage in any inappropriate coding techniques that would result in a classification and payment greater than one that reflects the service actually performed (upcoding).

We do not improperly bill for services separately that are required to be billed together (unbundling).

We bill for services provided to patients that are transferred to other facilities as transfers, not as discharges.

Billing by Teaching Physicians: When both residents and teaching physicians are involved in patient care, the teaching physicians are present during the key portion of the service (the critical portion, in the case of surgery and other procedures to which the critical-portion rule applies) and assure that their presence is documented in accordance with local, state and federal guidelines. Teaching physicians follow the applicable rules regarding documentation for coding of Evaluation and Management services.

Billing for Clinical Trials: We bill third-party payors for items/services that are considered standard of care and that are not covered by the sponsor, in accordance with applicable laws, rules and regulations. We bill the sponsor/grant for all items and services rendered for research purposes only, as well as for any other services that the sponsor has agreed to cover.



Effective Communication: Clinical and billing staffs effectively communicate with each other to ensure correct coding and billing of all services rendered.

Accurate and Timely Registration: All patient registration information is collected in a complete, accurate and timely manner.

Accurate Cost Reporting: We prepare Medicare and Medicaid cost reports in compliance with local, state and federal requirements.

Corrective Action Policy: When coding and/or billing errors are identified, applicable corrective action is taken, including refunding of any overpayment. As in the case of any other violation or error, corrective action for coding and/or billing errors includes taking steps to prevent recurrence.

Questions: When questions and concerns are raised regarding documentation, coding and/or billing, they are raised and reported up through the chain of command, to the Department of Compliance, and/or to the Compliance hotline, as applicable.

HUMAN RESOURCES

All employment decisions at Montefiore are based on the individual merit, personal qualifications and ability of the applicant or associate to perform the job. Montefiore recognizes that all associates contribute directly to the institution's success.

Equal Employment Opportunity: Montefiore does not discriminate in any employment decisions on the basis of race, creed, color, national origin, ancestry, gender, age, disability, veteran status, marital status, sexual orientation, gender identity or expression, genetic predisposition or carrier status, alienage or citizenship status.

Harassment: Montefiore provides a work environment that enables everyone to work with security and dignity, free from unwelcome, insulting, degrading or exploitive treatment or harassment. An Equal Employment Opportunity (EEO) Coordinator can receive, investigate and resolve any complaints of discrimination or harassment.

Verification of Qualifications: Montefiore hires only qualified individuals with proper expertise, licenses and experience. Qualifications are verified in connection with offering employment.

Employment of Relatives: Montefiore hires the most qualified candidate for any position, without preference to relatives of associates.

To ensure fairness and objectivity, relationships of a personal or family nature between supervisors and those they supervise are prohibited. Where such relationships exist, they must be disclosed

to the Vice President in charge of the area, and arrangements must be made for alternative supervision and evaluation, or for transfer of one of the participants to another work area.

Training and Development: Training and skills development programs are made available to associates to assist them in their job functions and to provide opportunities to realize their potential.

Open Door Policy for Problems: Associates are encouraged to share ideas and comments with supervisors, as well as to inform supervisors of any concerns or questions they may have about any aspect of their employment. Supervisors and managers respond as promptly as possible.

Respect for Cultural Values and Religious Beliefs: Montefiore values diversity and treats patients, families, visitors, associates, medical staff and all others with respect and dignity. We acknowledge that aspects of patient care may conflict with an associate's cultural values, ethics or religious beliefs. Human Resources policies provide a mechanism to address general concerns and specific requests to abstain from participating in any aspect of patient care on this basis.

Drug-Free, Smoke-Free Environment: Montefiore provides a safe, drug-free and smoke-free work environment. Manufacturing, dispensing, distributing, possessing, selling, using or working under the influence of a controlled substance, alcohol, illegal prescription medication or other intoxicants is prohibited.





SAFEGUARDING MONTEFIORE ASSETS

We protect institutional resources, including facilities, equipment, funds, information and data against loss, theft and misuse. We also protect property entrusted to Montefiore by others.

Use of Resources: Associates use resources responsibly and effectively, solely for the purposes of furthering Montefiore activities. We must not use these resources, including Montefiore facilities, resources or other property, or our positions for personal benefit or for the benefit of family members, friends or others.

Use of Funds: Montefiore funds are used only for legitimate business purposes of Montefiore. When associates submit payment requests, they provide all required supporting documentation and approvals.

Expenditures of Montefiore funds are recorded and accounted for in an accurate and timely manner.

Obsolete Furniture and Equipment: Furniture, office equipment and other property that is excess, obsolete, junked or no longer needed is reported to the Engineering Department for evaluation. No property is moved or transferred to another location, removed or otherwise disposed of except in accordance with our policies. Property is removed from Montefiore only with an appropriate property pass.



ENVIRONMENTAL CONSIDERATIONS

Montefiore provides a safe, functional and effective environment in which the health, safety, privacy and comfort of patients, visitors, associates, volunteers and contractors are the first priority.

Program Development: Supervisors and managers are responsible for developing programs to eliminate or minimize any hazards to health and safety in accordance with applicable law. We follow all safety policies and rules.

Safety Violations: Associates report any practice or condition that may be hazardous or that may violate safety standards to their supervisor or the Safety Officer.

Hazardous Materials: Associates who deal with hazardous materials and medical waste comply with all applicable environmental laws and regulations and follow the environmental and safety procedures explained in training programs. We strive to minimize the generation, discharge and disposal of medical waste and hazardous materials.

Sustainability: We must exercise leadership in our workplace by modeling ways to minimize and reverse the impact of our activities and facilities on the environment.

EMPLOYEE ISSUES AND CONCERNS

Open communication is essential for accomplishing Montefiore's mission. The success of the Compliance Program depends on maintaining effective channels of communication. Associates must be willing to bring forward problems, especially those that have regulatory implications.

Managers and supervisors are required to maintain an open door policy and be receptive to all concerns brought to them by any associate.

In the Event of a Problem: If you become aware of an activity that you think may be a problem, or if you have any questions about the Code or the Compliance Program, please contact your supervisor immediately. If you are not comfortable doing that, contact the appropriate department listed in the directory at the back of this brochure.

Following Up the Chain of Command: If you are unsatisfied with the response or have additional concerns, you should continue to raise the issue through the supervisory structure or to the Department of Compliance.

Retaliation: Retaliation against any associate for reporting something he or she sincerely believes may be a violation, or for participating in good faith in an investigation of suspected misconduct, is prohibited; you will be protected, even if the report of misconduct is mistaken. Acts of retaliation should be reported immediately and will be disciplined appropriately.

However, deliberately and knowingly making a false report is not a protected activity and will result in appropriate discipline. Self-reporting an associate's own violation will not provide immunity from appropriate disciplinary action. However, if an associate comes forward to report his or her own violation, appropriate leniency in the discipline to be applied will be considered.

Hotline: Montefiore has established a hotline to enable employees to confidentially report problems or get answers to questions. It is recommended to follow the reporting chain of command when reporting concerns; however, there may be instances when an individual is more comfortable reporting directly through the hotline. As a reminder, the hotline is not a substitute for established grievance policies or processes.

The hotline is available at 1-800-662-8595 or www.montefiore.alertline.com



TOPIC	CONTACT	NUMBER
MONTEFIORE MEDICAL CENTER		
Billing Compliance	Billing Compliance	718-920-8207
Conflicts of Interest	Compliance Officer	718-920-6624
Department of Compliance	Compliance Officer	718-920-8239
CMO, Physician and Other Professional Credentialing	Credentialing Office	914-378-4690
Employment Discrimination, Sexual Harassment	EEO Coordinator or designee	718-920-4998
Compliance Hotline	Department of Compliance	800-662-8595 www.montefiore.alertline.com
Home Health Agency	Quality Management, Education, Regulatory Compliance	718-405-4501
Labor Law Compliance, Retaliation, Protection for Reporting	Human Resources	718-920-4998
Medical Legal, Patient Care Issues	Risk Management	718-920-6340
Department of Health (DOH)/The Joint Commission Office Professional Medical Conduct/Office Mental Health/Office Professional Discipline	Regulatory Affairs	718-920-5026
Patient Service Issues and Concerns	Customer Services	Moses Campus and Children's Hospital at Montefiore 718-920-4943 Einstein Campus 718-904-2395 Wakefield Campus 718-920-9888
Privacy and Confidentiality Issues	Privacy Officer	718-920-8239
Information Security Issues	Information Security Officer	914-457-6665

TOPIC	CONTACT	NUMBER
Safety/Occupational Safety and Health Administration (OSHA)	Environmental Health and Safety	718-920-5104
Security 24-hr. Base Station	Moses Campus and Children's Hospital at Montefiore Einstein Campus Wakefield Campus Westchester Square	718-920-5668 718-904-2800 718-920-9640 718-430-7344
MONTEFIORE NEW ROCHELLE		
Billing Compliance	Compliance Officer	914-365-4808
Conflicts of Interest	Compliance Officer	914-365-4808
Department of Compliance	Compliance Officer	914-365-4808
Physician and Other Professional Credentialing	Credentialing Office	914-377-4690
Employment Discrimination, Sexual Harassment	Human Resources	914-365-4806
Compliance Hotline	Department of Compliance	800-662-8595 www.montefiore.alertline.com
Labor Law Compliance, Retaliation, Protection for Reporting	Human Resources	914-365-4806
Medical Legal, Patient Care Issues	Risk Management	914-365-4865
DOH/The Joint Commission	Quality and Regulatory	914-365-3278
Office Professional Medical Conduct/ Office Professional Discipline	Medical Affairs	914-365-3842
Patient Service Issues and Concerns	Patient Relations	914-365-3468
Privacy and Confidentiality Issues	Compliance Officer	914-365-4808
Information Security Issues	Information Security Officer	914-457-6665
Safety/OSHA	Environmental Health & Safety	718-920-7600
Security 24-hr. Base Station	New Rochelle Campus Security	914-365-3779

TOPIC	CONTACT	NUMBER
MONTEFIORE MOUNT VERNON		
Billing Compliance	Compliance Officer	914-365-4808
Conflicts of Interest	Compliance Officer	914-365-4808
Department of Compliance	Compliance Officer	914-365-4808
Physician and Other Professional Credentialing	Credentialing Office	914-377-4690
Employment Discrimination, Sexual Harassment	Human Resources	914-365-4806
Compliance Hotline	Department of Compliance	800-662-8595 www.montefiore.alertline.com
Labor Law Compliance, Retaliation, Protection for Reporting	Human Resources	914-365-4806
Medical Legal, Patient Care Issues	Risk Management	914-365-4865
DOH/The Joint Commission	Regulatory and Quality Management	914-361-6278
Office Professional Medical Conduct/ Office Professional Discipline	Office of Administration	914-361-6441
Office of Mental Health	Department of Psychiatry	914-361-7199
Patient Service Issues and Concerns	Patient Experience Office	914-361-7287
Privacy and Confidentiality Issues	Compliance Officer	914-365-4808
Information Security Issues	Information Security Officer	914-457-6665
Safety/OSHA	Environmental Health & Safety	718-920-7600
Security 24-hr. Base Station	Mount Vernon Campus Security	914-361-6040

TOPIC	CONTACT	NUMBER
SCHAFFER EXTENDED CARE CENTER		
Billing Compliance	Compliance Officer	914-365-4808
Conflicts of Interest	Compliance Officer	914-365-4808
Department of Compliance	Compliance Officer	914-365-4808
Physician and Other Professional Credentialing	Medical Affairs and Credentialing Office	914-377-4690
Employment Discrimination, Sexual Harassment	Human Resources	914-365-4806
Compliance Hotline	Department of Compliance	800-662-8595 www.montefiore.alertline.com
Labor Law Compliance, Retaliation, Protection for Reporting	Human Resources	914-365-4806
Patient Service Issues	Patient Relations	914-365-3468
DOH	Administration	914-365-3800
Patient/Resident Complaints and Concerns	Social Services	914-365-3807
Privacy and Confidentiality Issues	Compliance Officer	914-365-4808
Information Security Issues	Information Security Officer	914-457-6665
Safety/OSHA	Environmental Health & Safety	718-920-7600
Security 24-hr. Base Station	New Rochelle Campus Security	914-365-3779

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